

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

SITO MOBILE R&D IP, LLC, and  
SITO MOBILE, LTD.,

Plaintiffs,

v.

SFA HOLDINGS INC. f/k/a SAKS  
INCORPORATED,

Defendant.

Case No. 1:23-cv-00688

Jury Trial Demanded

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiffs SITO Mobile R&D IP, LLC and SITO Mobile, Ltd., by and through their undersigned counsel, file this Complaint against SFA Holdings Inc. f/k/a Saks Incorporated (“Saks”) for patent infringement of United States Patent Nos. 7,191,244; 8,015,307; 8,554,940; 9,349,138; 10,735,781; and 10,769,675 (collectively, the “patents-in-suit” and attached as Exhibits 1-6 respectively) and allege as follows:

**NATURE OF THE ACTION**

1. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.*

### **THE PARTIES**

2. Plaintiff SITO Mobile, Ltd. is a company organized and existing under the laws of the State of Delaware with its principal place of business located at 123 Town Square Place, Suite 419, Jersey City, New Jersey 07310.

3. Plaintiff SITO Mobile R&D IP, LLC is a limited liability company organized and existing under the laws of the State of Delaware with its principal place of business located at 123 Town Square Place, Suite 419, Jersey City, New Jersey 07310. Plaintiff SITO Mobile R&D IP, LLC is a wholly owned subsidiary of Plaintiff SITO Mobile, Ltd. (collectively "SITO"). SITO Mobile R&D IP, LLC is a patent holding company that does not exist separate from its parent SITO Mobile, Ltd. In that regard, SITO Mobile, Ltd. controls all of SITO Mobile R&D IP, LLC's business operations and SITO Mobile R&D IP, LLC's financials roll-up into SITO Mobile, Ltd.

4. On information and belief, Saks is a Tennessee corporation with a principal place of business at 225 Liberty St, Fl 31, New York, NY 10281-1089.

5. On information and belief, Saks maintains a regular and established place of business at 7400 San Pedro Ave., San Antonio, TX 78216.

### **JURISDICTION AND VENUE**

6. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.*

7. This Court has personal jurisdiction over Saks in accordance with due process and/or the Texas Long Arm Statute because, because it has committed and

continues to commit acts of infringement giving rise to this action in the State of Texas in violation of at least 35 U.S.C. §§ 271(a). In particular, on information and belief, Saks has made, used, offered to sell and/or sold infringing products, services and/or systems in the State of Texas.

8. This Court has personal jurisdiction over Saks for at least the following reasons: (1) Saks is present in within or has minimum contacts within the State of Texas and the Western District of Texas; (2) Saks has purposefully availed itself of the privileges of conducting business in the State of Texas and in this district; (3) Saks has sought privileges, protections, and benefits from the laws of the State of Texas; and (4) Saks regularly conducts business within the State of Texas and within this district, and Plaintiff's cause of action arises directly from Defendant's business contacts and other activities in the State of Texas and in this district, including deriving substantial revenue from the infringing goods and services in the State of Texas and this judicial district.

9. On information and belief, Saks owns and operates department stores in this judicial district, including at least at 7400 San Pedro Ave., San Antonio, TX 78216.

10. On information and belief, Saks solicits Texas-based customers through its infringing video streaming services, including through its performance of demonstrations of infringing products and services in the State of Texas and in this Judicial District including by accessing [www.saksfifthavenue.com](http://www.saksfifthavenue.com).

11. On information and belief, Saks (or those acting on its behalf) makes, uses, sells, imports and/or offers to sell the infringing video streaming services, including through the [www.saksfifthavenue.com](http://www.saksfifthavenue.com) website in the United States, and this judicial

district that infringe (literally and/or under the doctrine of equivalents) one or more claims of each of the patents-in-suit.

12. This Court has personal jurisdiction over Saks because Saks has sufficient minimum contacts with this forum as a result of business conducted within the State of Texas and this judicial district. In particular, this Court has personal jurisdiction over Saks because, *inter alia*, Saks, on information and belief (directly and/or through its subsidiaries, affiliates, or intermediaries), has substantial, continuous, and systematic business contacts in this judicial district, and derives substantial revenue from infringing goods and services provided to individuals in the State of Texas and this Judicial District.

13. Saks (directly and/or through its subsidiaries, affiliates, or intermediaries) has purposefully availed itself of the privileges of conducting business within the State of Texas and in this Judicial District, has established sufficient minimum contacts with this Judicial District such that it should reasonably and fairly anticipate being hauled into court in this Judicial District, has purposefully directed activities at residents of this judicial district, and at least a portion of the patent infringement claims alleged in this Complaint arise out of or are related to one or more of the foregoing activities.

14. On information and belief, Saks is subject to the Court's jurisdiction because it regularly markets, conducts, and solicits business, or otherwise engages in other persistent courses of conduct in the State of Texas, and/or derives substantial revenue from the sale and distribution of goods and services provided to individuals and businesses in the State of Texas including with respect to the

accused Saks Video Streaming Service.

15. On information and belief, the accused Saks Video Streaming Service, that Saks uses, makes, markets, distributes, offers to sell, and sells to consumers throughout the United States, including in the State of Texas, infringe one or more claims of the patents-in-suit.





16. Venue is proper pursuant to 28 U.S.C. §§ 1391(b), (c), (d), 1400(b) and the Federal Circuit's decision in *In re Monolithic Power Sys.*, 50 F.4th 157 (Fed. Cir. 2022), because in addition to Saks' physical locations in this judicial district, upon information and belief, Saks has numerous known employees based out of this division of this judicial district as listed on LinkedIn,<sup>1</sup> and, upon and information and belief, uses these employees' homes to transact its business including performing secretarial services, and storing literature, documents, and products. Saks has also directly and/or indirectly committed acts of patent infringement in this district.

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<sup>1</sup> See e.g.,

[https://www.linkedin.com/search/results/people/?currentCompany=%5B%22157315%22%2C%223961319%22%2C%2293075952%22%2C%2289989306%22%5D&geoUrn=%5B%2290000064%22%5D&heroEntityKey=urn%3Ali%3Aorganization%3A157315&keywords=saks%20fifth%20avenue&origin=FACETED\\_SEARCH&position=1&searchId=f08ed9a3-724a-4c7f-9683-52e2c05f8a3a&sid=CB5](https://www.linkedin.com/search/results/people/?currentCompany=%5B%22157315%22%2C%223961319%22%2C%2293075952%22%2C%2289989306%22%5D&geoUrn=%5B%2290000064%22%5D&heroEntityKey=urn%3Ali%3Aorganization%3A157315&keywords=saks%20fifth%20avenue&origin=FACETED_SEARCH&position=1&searchId=f08ed9a3-724a-4c7f-9683-52e2c05f8a3a&sid=CB5).

42 results

	<b>Elliott Chenger</b> • 3rd+  Engineering Leader Austin, TX Current: Senior Engineering Manager at <b>Saks Fifth Avenue</b>	<a href="#">Message</a>
	<b>Stacey Conklin</b> • 3rd+ general Manager at Saks Fifth Avenue San Marcos, TX Current: general manager at <b>Saks 5th Avenue Outlet</b>	<a href="#">Connect</a>
	<b>Gamir Shrestha</b> • 3rd+ Senior Mobile Engineer at Saks Austin, TX Current: Senior Mobile Engineer at <b>Saks Fifth Avenue</b>	<a href="#">Message</a>
	<b>LinkedIn Member</b> Director, PR & Special Events, Fifth Avenue Club at Saks Fifth Ave... Austin, TX	
	<b>LinkedIn Member</b> consultant at Saks Fifth Avenue Austin, TX	
	<b>Jasmine Sawyer</b> • 3rd+ Senior Technical Analyst at Saks Fifth Avenue Austin, TX	<a href="#">Message</a>
	<b>Keshun Greene</b> • 3rd+ Fashion/Business Administration at Florida State University Austin, TX Current: Operations Coordinator at <b>Saks Fifth Avenue</b> Provides services - Customer Service, Administrative Assistance, Appointment Scheduling, Advertising, Brand Marketing	<a href="#">Follow</a>

### SAKS VIDEO STREAMING SERVICE

17. Saks is the premier destination for luxury fashion, driven by a mission to help customers express themselves through relevant and inspiring style.<sup>2</sup>

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<sup>2</sup> <https://www.saksfifthavenue.com/>

18. Saks users can access its services through any device including phones, tablets, and computers.<sup>3</sup>

19. Saks streams videos using a network(s) of servers (“Saks Streaming Platform”). Saks uses HTTP Live Streaming (HLS) protocol to stream video content. HLS is an HTTP-based adaptive bitrate streaming technique that enables high-quality streaming of media content over the Internet from web servers. The operation of HLS is described in standards documents.<sup>4</sup>

20. With HLS, a video may be broken up into thousands of small HTTP-based file segments. Each segment contains a short interval of playback time of the video. The segments are encoded at a variety of different bit rates (speeds). After a video is selected to be streamed, the media player on the subscriber device is provided with a file that informs the player, amongst other things, how to obtain the segments sequentially and how to handle ad breaks (if any). As the video is playing, the subscriber device determines the bit rate that it can handle and requests a segment(s) encoded at that bit rate. The player plays the segments in sequential order and continuously requests segments until the player has received all of the segments that make up the video.

### **THE PATENTS-IN-SUIT**

#### **United States Patent No. 7,191,244**

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<sup>3</sup> *Id.*

<sup>4</sup> The MPEG-DASH standard is available at <https://www.iso.org/ics/35.040.40/x/>. A copy of the HLS standard is attached hereto as Exhibit 7.

21. On March 13, 2007, the USPTO duly and legally issued United States Patent No. 7,191,244 (“the ‘244 patent”) entitled “System and Method for Routing Media” to inventor Charles A. Jennings et al. The ‘244 patent is attached as Exhibit 1.

22. The ‘244 patent is presumed valid under 35 U.S.C. § 282.

23. SITO Mobile R&D IP, LLC owns all rights, title, and interest in the ‘244 patent.

24. SITO Mobile, Ltd. maintains equitable title over the ‘244 patent as SITO Mobile R&D IP, LLC is a wholly-owned subsidiary of SITO Mobile, Ltd. As part of this ownership, SITO Mobile, Ltd. exercises complete control over SITO Mobile R&D IP, LLC, including control over all of SITO Mobile R&D IP, LLC’s business decisions and SITO Mobile R&D IP, LLC’s patent enforcement, assignment, and licensing policies.

25. Because of the structure of this corporate relationship and SITO Mobile, Ltd.’s complete control over SITO Mobile R&D IP, LLC’s patent licensing and enforcement policies, SITO Mobile, Ltd. has and has had control over the ‘244 patent and has enjoyed exclusive rights thereunder.

**United States Patent No. 8,015,307**

26. On September 06, 2011, the USPTO duly and legally issued United States Patent No. 8,015,307 (“the ‘307 patent”) entitled “System and Method for Streaming Media” to inventor Charles A. Jennings et al. The ‘307 patent is attached as Exhibit 2.

27. The ‘307 patent is presumed valid under 35 U.S.C. § 282.



28. SITO Mobile R&D IP, LLC owns all rights, title and interest in the '307 patent.

29. SITO Mobile, Ltd. maintains equitable title over the '307 patent as SITO Mobile R&D IP, LLC is a wholly-owned subsidiary of SITO Mobile, Ltd. As part of this ownership, SITO Mobile, Ltd. exercises complete control over SITO Mobile R&D IP, LLC, including control over all of SITO Mobile R&D IP, LLC's business decisions and SITO Mobile R&D IP, LLC's patent enforcement, assignment, and licensing policies.

30. Because of the structure of this corporate relationship and SITO Mobile, Ltd.'s complete control over SITO Mobile R&D IP, LLC's patent licensing and enforcement policies, SITO Mobile, Ltd. has and has had control over the '307 patent and has enjoyed exclusive rights thereunder.

**United States Patent No. 8,554,940**

31. On October 08, 2013, the USPTO duly and legally issued United States Patent No. 8,554,940 ("the '940 patent") entitled "System and Method for Routing Media" to inventor Charles A. Jennings et al. The '940 patent is attached as Exhibit 3.

32. The '940 patent is presumed valid under 35 U.S.C. § 282.

33. SITO Mobile R&D IP, LLC owns all rights, title and interest in the '940 patent.

34. SITO Mobile, Ltd. maintains equitable title over the '940 patent as SITO Mobile R&D IP, LLC is a wholly-owned subsidiary of SITO Mobile, Ltd. As part of this ownership, SITO Mobile, Ltd. exercises complete control over SITO Mobile R&D IP,

LLC, including control over all of SITO Mobile R&D IP, LLC's business decisions and SITO Mobile R&D IP, LLC's patent enforcement, assignment, and licensing policies.

35. Because of the structure of this corporate relationship and SITO Mobile, Ltd.'s complete control over SITO Mobile R&D IP, LLC's patent licensing and enforcement policies, SITO Mobile, Ltd. has and has had control over the '940 patent and has enjoyed exclusive rights thereunder.

**United States Patent No. 9,349,138**

36. On May 24, 2016, the USPTO duly and legally issued United States Patent No. 9,349,138 ("the '138 patent") entitled "System and Method for Streaming Media" to inventor Charles A. Jennings et al. The '138 patent is attached as Exhibit 4.

37. The '138 patent is presumed valid under 35 U.S.C. § 282.

38. SITO Mobile R&D IP, LLC owns all rights, title and interest in the '138 patent.

39. SITO Mobile, Ltd. maintains equitable title over the '138 patent as SITO Mobile R&D IP, LLC is a wholly-owned subsidiary of SITO Mobile, Ltd. As part of this ownership, SITO Mobile, Ltd. exercises complete control over SITO Mobile R&D IP, LLC, including control over all of SITO Mobile R&D IP, LLC's business decisions and SITO Mobile R&D IP, LLC's patent enforcement, assignment, and licensing policies.

40. Because of the structure of this corporate relationship and SITO Mobile, Ltd.'s complete control over SITO Mobile R&D IP, LLC's patent licensing and enforcement policies, SITO Mobile, Ltd. has and has had control over the '138 patent and has enjoyed exclusive rights thereunder.

**United States Patent No. 10,735,781**

41. On August 04, 2020, the USPTO duly and legally issued United States Patent No. 10,735,781 (“the ‘781 patent”) entitled “System and Method for Routing Media” to inventor Charles A. Jennings et al. The ‘781 patent is attached as Exhibit 5.

42. The ‘781 patent is presumed valid under 35 U.S.C. § 282.

43. SITO Mobile R&D IP, LLC owns all rights, title and interest in the ‘781 patent.

44. SITO Mobile, Ltd. maintains equitable title over the ‘781 patent as SITO Mobile R&D IP, LLC is a wholly-owned subsidiary of SITO Mobile, Ltd. As part of this ownership, SITO Mobile, Ltd. exercises complete control over SITO Mobile R&D IP, LLC, including control over all of SITO Mobile R&D IP, LLC’s business decisions and SITO Mobile R&D IP, LLC’s patent enforcement, assignment, and licensing policies.

45. Because of the structure of this corporate relationship and SITO Mobile, Ltd.’s complete control over SITO Mobile R&D IP, LLC’s patent licensing and enforcement policies, SITO Mobile, Ltd. has and has had control over the ‘781 patent and has enjoyed exclusive rights thereunder.

**United States Patent No. 10,769,675**

46. On September 8, 2020, the USPTO duly and legally issued United States Patent No. 10,769,675 (“the ‘675 patent”) entitled “System and Method for Routing Media” to inventor Charles A. Jennings et al. The ‘675 patent is attached as Exhibit 6.

47. The ‘675 patent is presumed valid under 35 U.S.C. § 282.

48. SITO Mobile R&D IP, LLC owns all rights, title and interest in the '675 patent.

49. SITO Mobile, Ltd. maintains equitable title over the '675 patent as SITO Mobile R&D IP, LLC is a wholly-owned subsidiary of SITO Mobile, Ltd. As part of this ownership, SITO Mobile, Ltd. exercises complete control over SITO Mobile R&D IP, LLC, including control over all of SITO Mobile R&D IP, LLC's business decisions and SITO Mobile R&D IP, LLC's patent enforcement, assignment, and licensing policies.

50. Because of the structure of this corporate relationship and SITO Mobile, Ltd.'s complete control over SITO Mobile R&D IP, LLC's patent licensing and enforcement policies, SITO Mobile, Ltd. has and has had control over the '675 patent and has enjoyed exclusive rights thereunder.

### **CLAIMS FOR RELIEF**

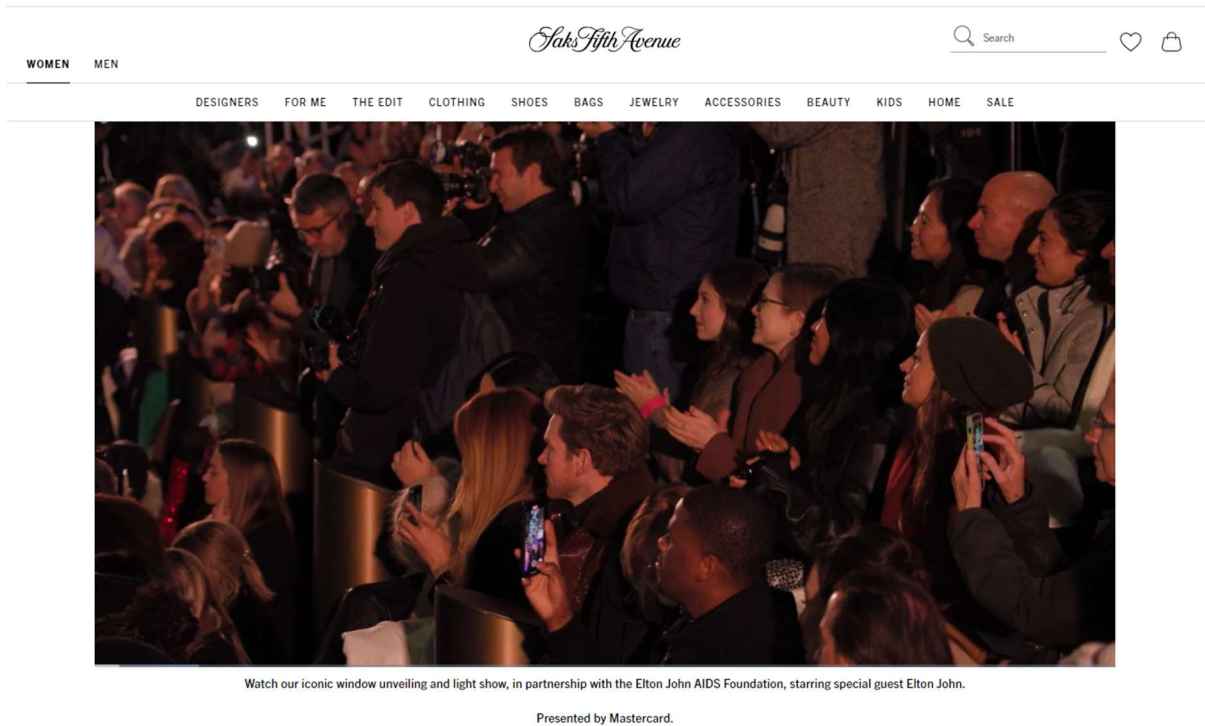
#### **Count I – Infringement of United States Patent No. 7,191,244**

51. SITO alleges, and incorporates by reference, as if fully set forth here, the preceding paragraphs of this Complaint.

52. Saks directly infringes (literally and/or under the doctrine of equivalents) the '244 patent by using the method covered by at least claim 2 of the '244 patent.

53. On information and belief, and without SITO's approval, authorization and license, Saks owns, controls, operates, and uses a system for streaming media that includes the Saks Streaming Platform, as well as other Saks networks, systems, devices, components and/or services for streaming media, that practices and infringes the media streaming method recited in at least claim 2 of the '244 patent.

54. Saks performs a method of streaming video content based on a request (e.g., GET request) as demonstrated by the example provided below:



See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

Status	Method	Domain	File	Initi...	Type	Size
200	GET	www.googletag...	a?id=AW-867837652&cv=1&v=3&t=1&pid=246754650&rv=...	72fc...	html	0 B
200	GET	8270149.fs.d...	activity?src=8270149&type=land&cat=saks-0&ord=1&num=27&sub=...	57...	html	57...
200	GET	www.google.com	anchor?ar=1&k=6LtzSaYAAAAAKUMeZITBWWAsRo1hkbQhnl...	sub...	html	42...
200	GET	www.google.com	anchor?ar=1&k=6LtzSaYAAAAAKUMeZITBWWAsRo1hkbQhnl...	sub...	html	43...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=11&Availability.prefix=Visi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=129&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=149&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=152&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=170&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=233&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=239&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=264&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=268&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=280&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=299&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=305&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=330&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=333&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=345&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=390&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=400&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=417&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=419&Availability.prefix=Vi...	72fc...	js	16...
200	GET	d.la5-c1-ia4.s...	Availability.json?tsid=undefined&r=440&Availability.prefix=Vi...	72fc...	js	16...

493 requests | 63.83 MB / 13.88 MB transferred | Finish: 40.43 min

Response Headers (903 B)

```

alt-svc: h3="443"; ma=2592000,h3-29="443"; ma=2592000,h3-Q050="443";
ma=2592000,h3-Q046="443"; ma=2592000,h3-Q043="443"; ma=2592000,q
uic="443"; ma=2592000; v="46,43"
cache-control: no-cache, must-revalidate
content-encoding: br
content-length: 299
content-type: text/html; charset=UTF-8
cross-origin-resource-policy: cross-origin
date: Wed, 28 Dec 2022 10:20:50 GMT
expires: Fri, 01 Jan 1990 00:00:00 GMT
p3p: policyref="https://googleads.g.doubleclick.net/pagead/privacy_p3p.xml", CP
="CURa ADMA DEVa TAlO P5Ao PSDo OUR IND UNI PUR INT DEM STA PRE COM
NAV OTC NOI DSP COR"
pragma: no-cache
server: cafe
set-cookie: test_cookie=CheckForPermission; expires=Wed, 28-Dec-2022 10:35:5

```



See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

55. Saks identifies at least one program in which at least a portion of the media is available (e.g., STATUS 200 OK).

The screenshot displays the 'Network' tab of a web browser's developer tools. The left pane shows a list of 493 requests, with the first few being GET requests to various domains including www.google.com and dJa5-c1-ia4.s... The right pane shows the 'Headers' section for the selected request, displaying various response headers such as content-length, content-type, cross-origin-resource-policy, date, expires, p3p, pragma, server, set-cookie, strict-transport-security, timing-Allow-Origin, x-content-type-options, x-xss-protection, and request headers like Accept, Accept-Encoding, Accept-Language, Alt-Used, Connection, Host, Referer, Sec-Fetch-Dest, Sec-Fetch-Mode, Sec-Fetch-Site, Upgrade-Insecure-Requests, and User-Agent.

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

56. Saks processes the request (e.g., GET request) with at least one program rule of the at least one program to generate a presentation (e.g., M3U8 file) identifying the at least the portion of the media.

16



[illegible]

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

57. Saks generates a reservation (e.g., connection, session) associated with the presentation as demonstrated by the example provided below:

Inspector
Console
Debugger
Network
Style Editor
Performance
Memory
Storage
Accessibility
Application
6

Filter URLs
All
HTML
CSS
JS
XHR
Fonts
Images
Media
WS
Other
Disable Cache
No Throttling

Status	Method	Domain	File	Init...	Type	Size
200	GET	www.googletag...	a7id=AW-867837652&cv=1&v=3&t=&tpid=246754650&rs=72f...		html	0 B
200	GET	8270149.fs.d...	activityjsrc=8270149?type=land0i:cat=saks-Qord=1num=27- sub...		html	57...
200	GET	www.google.com	anchor?ar=1&k=6LfzSaYZAAAAKUmeZIBWVAsRo1hkQhnl sub...		html	42...
200	GET	www.google.com	anchor?ar=1&k=6LfzSaYZAAAAKUmeZIBWVAsRo1hkQhnl sub...		html	43...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=11&Availability.prefix=Visi	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=129&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=149&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=152&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=170&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=233&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=239&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=264&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=268&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=280&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=298&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=305&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=330&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=333&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=345&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=390&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=400&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=417&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=419&Availability.prefix=Vic	72f...	js	16...
200	GET	d1a5-c1-ia4.s...	Availability.jsp?sid=undefined&r=440&Availability.prefix=Vic	72f...	js	16...

493 requests
63.83 MB / 13.88 MB transferred
Finish: 40.43 min

Headers
Cookies
Request
Response
Timings
Security

Filter Headers
Block Reser

GET https://8270149.fs.doublicke.net/activityjsrc=8270149?type=land0i:cat=saks-Qord=1num=271537451155gsm=2oobu0:auicd=2129078717167222305u=1ilve-stream%3Avideou10=guestu11=sectionu12=saks.com%3Alive-stream%3Avideocgid=mYmQxMTI:-oref=https%3A2f2Fww.saksffthvenue.com%2F2c%2Flive-stream%2Fvideou

Status
200 OK

Version
HTTP/3

Transferred
1.20 kB (575 B size)

Referrer Policy
strict-origin-when-cross-origin

Blocking
Enhanced Tracking Protection
This URL matches a known tracker and it would be blocked with Content Blocking enabled.

Response Headers (903 B)
Raw

alt-svc: h3="443"; ma=2592000,h3-29="443"; ma=2592000,h3-Q050="443"; ma=2592000,h3-Q046="443"; ma=2592000,h3-Q043="443"; ma=2592000,qic="443"; ma=2592000;v="46.43"

cache-control: no-cache, must-revalidate

content-encoding: br

content-length: 299

content-type: text/html; charset=UTF-8

cross-origin-resource-policy: cross-origin

date: Wed, 28 Dec 2022 10:20:50 GMT

expires: Fri, 01 Jan 1990 00:00:00 GMT

p3p: policyref="https://googleads.g.doubleclick.net/pagead/clk\_p3p.xml", CP="CURa ADMa DEVa TAla PSaOs PsDo OUR IND INT DEM STA PRE COM NAV OTC NOI DSP COR"

pragma: no-cache

server: safe

set-cookie: test\_cookie=CheckForPermission; expires=Wed, 28-Dec-2022 10:35:

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

The screenshot displays the Chrome DevTools interface, specifically the Network tab. A REST client request is selected, showing details about the request and its response.

Status	Method	Domain	File	Initia...	Type	Size
200	GET	www.gstatic.com	recaptcha_en.js		script	41...
200	GET	www.gstatic.com	recaptcha_en.js		web...js	41...
200	GET	www.gstatic.com	recaptcha_en.js		web...js	41...
200	GET	widgets.stores.sa...	render?data=[{"expires":"","remove"},"sf_wdt_session_expiration_ses:	72f...	png	11...
200	GET	manifest.prod.bol...	rendition.m3u8?fastly_token=NjNhYzcmM2VlYTAyNmBmNjk0ZjFh	72fc...	x-mpeguri	27...
200	GET	manifest.prod.bol...	rendition.m3u8?fastly_token=NjNhYzcmM2VlYzg1NDZlYWwJMDI	72fc...	x-mpeguri	26...
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env:	72fc...	json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env:	72fc...	json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env:	72fc...	json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env:	72fc...	json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env:	72fc...	json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env:	72fc...	json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env:	72fc...	json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env:	72fc...	json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env:	72fc...	json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env:	72fc...	json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env:	72fc...	json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env:	72fc...	json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env:	72fc...	json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env:	72fc...	json	53 B

### Headers

**Filter Headers**

- accept-ranges:** bytes
- access-control-allow-headers:** X-Requested-With,Origin,Range,Accept-Encoding,Referer
- access-control-allow-methods:** GET,HEAD,OPTIONS
- access-control-allow-origin:** \*
- access-control-expose-headers:** Server,Range,Content-Length,Content-Range
- age:** 0
- cache-control:** s-maxage=10800,max-age=10800
- content-length:** 27290
- content-type:** application/x-mpegURL
- date:** Wed, 28 Dec 2022 10:11:50 GMT
- via:** 1.1 varnish
- x-cache:** MISS
- x-cache-hits:** 0
- x-device-group:** desktop-firefox
- X-Firefo-Spydy:** h2
- x-powered-by:** BC
- x-powered-from:** gantry
- x-served-by:** cache-hyd1100024-HYD
- x-timer:** S167222311.560233.VS0,V5E383

**Request Headers (655 B)**

- Accept:** \*/\*
- Accept-Encoding:** gzip, deflate, br
- Accept-Language:** en-US,en;q=0.5
- Connection:** keep-alive
- Host:** manifest.prod.boltdns.net
- Origin:** https://www.saksfitthavenue.com
- Referer:** https://www.saksfitthavenue.com/
- Sec-Fetch-Dest:** empty
- Sec-Fetch-Mode:** cors

465 requests    63.82 MB / 13.86 MB transferred    Finish: 24.77 min



The screenshot shows the Network tab of a web browser. The list of requests includes several GET requests to 'www.gstatic.com' for 'recaptcha\_en.js' and a series of POST requests to 'rum.browser-inta...'. The selected request is a GET to 'manifest.prod.bol...' with a 27KB x-mpegurl response. The right pane displays the response headers:

```

access-control-allow-methods: GET,HEAD,OPTIONS
access-control-allow-origin: *
access-control-expose-headers: Server,Range,Content-Length,Content-Range
age: 0
cache-control: s-maxage=10800, max-age=10800
content-length: 27290
content-type: application/x-mpegURL
date: Wed, 28 Dec 2022 10:11:50 GMT
via: 1.1 varnish
x-cache: MISS
x-cache-hits: 0
x-device-group: desktop-firefox
X-Firefox-Spdy: h2
x-powered-by: BC
x-powered-from: gantry
x-served-by: cache-hyd1100024-HYD
x-timer: S167222311.560233,V50,VE383

```

Below the headers, the Request Headers (655 B) are shown:

```

Accept: */*
Accept-Encoding: gzip, deflate, br
Accept-Language: en-US,en;q=0.5
Connection: keep-alive
Host: manifest.prod.boltdns.net
Origin: https://www.saksfifthavenue.com/
Referer: https://www.saksfifthavenue.com/
Sec-Fetch-Dest: empty
Sec-Fetch-Mode: cors
Sec-Fetch-Site: cross-site
User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0

```

The screenshot shows the Network tab of a web browser. The list of requests includes several GET requests to 'www.gstat...' for 'recaptcha\_en.js' and a series of POST requests to 'rum.brows...'. The selected request is a GET to 'manifest.p...' with a 27KB x-mpegurl response. The right pane displays the response payload:

```

1 #EXTM3U
2 #EXT-X-VERSION:3
3 #EXT-X-PLAYLIST-TYPE:VOD
4 #EXT-X-MEDIA-SEQUENCE:0
5 #EXT-X-TARGETDURATION:10
6 #EXTINF:9.920,
7 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
8 #EXTINF:9.920,
9 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
10 #EXTINF:9.920,
11 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
12 #EXTINF:9.920,
13 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
14 #EXTINF:9.920,
15 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
16 #EXTINF:9.920,
17 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
18 #EXTINF:9.920,
19 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
20 #EXTINF:9.920,
21 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
22 #EXTINF:9.920,
23 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
24 #EXTINF:9.920,
25 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
26 #EXTINF:9.920,
27 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
28 #EXTINF:9.920,
29 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
30 #EXTINF:9.920,
31 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
32 #EXTINF:9.920,
33 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
34 #EXTINF:9.920,
35 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
36 #EXTINF:9.920,
37 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
38 #EXTINF:9.920,
39 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
40 #EXTINF:9.920,
41 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
42 #EXTINF:9.920,
43 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
44 #EXTINF:9.920,
45 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b

```

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

58. Saks identifies at least one resource (e.g., CDN) to stream the presentation for reception by the viewer (e.g., client device) based on the reservation.

20



The screenshot shows the Network tab of a web browser's developer tools. The left pane lists 468 requests, including GET requests for 'recaptcha\_en.js' and 'manifest.p...'. The right pane shows the 'Response' for a selected request, displaying a JSON payload with fields like 'EXTM3U', 'EXT-X-VERSION:3', 'EXT-X-PLAYLIST-TYPE:VOD', 'EXT-X-MEDIA-SEQUENCE:0', 'EXT-X-TARGETDURATION:10', and a list of media segments with their URLs and durations.

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

The screenshot shows the Network tab of a web browser's developer tools. The left pane lists 469 requests, including GET requests for 'segment1.ts?akamai\_token=exp=1672245569~ad=/media/v1/72fc...'. The right pane shows the 'Response Headers' for a selected request, displaying various headers such as 'Accept-Ranges: bytes', 'Access-Control-Allow-Headers', 'Access-Control-Allow-Methods', 'Access-Control-Allow-Origin', 'Access-Control-Expose-Headers', 'Cache-Control', 'Connection', 'Content-Length', 'Content-Type', 'Date', 'ETag', 'Expires', and 'Last-Modified'.

The screenshot shows a web browser's developer tools with the 'Network' tab selected. A list of network requests is displayed, with the selected request being a GET request to 'segment1.ts?akamai\_token=exp=1672245569~ad=/media/v1 72fc...' from 'bcbolt446c5271...'. The 'Headers' panel on the right shows the request headers, including 'Accept: \*/\*', 'Accept-Encoding: gzip, deflate, br', 'Accept-Language: en-US,en;q=0.5', 'Connection: keep-alive', 'Host: bcbolt446c5271-a.akamaihd.net', 'Origin: https://www.saksfifthavenue.com', 'Referer: https://www.saksfifthavenue.com', 'Sec-Fetch-Dest: empty', 'Sec-Fetch-Mode: cors', 'Sec-Fetch-Site: cross-site', and 'User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0'.

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

59. On information and belief, Saks has been on notice of the '244 patent at least as early as January 26, 2023, when Saks' in-house counsel responded to SITO's counsel's January 9, 2023 letter concerning Saks' infringement of the patents-in-suit.

60. On information and belief, at least since January 26, 2023, Saks knowingly encouraged and continues to encourage, its customers to directly infringe one or more claims of the '244 patent, including by Saks' actions that include, without limitation, instructing and encouraging its customers to use the Saks Video Streaming Services through the publishing, distribution, and propagation of targeted user emails, shopping offers, support documents, blog posts, live events, and instructions, including but not limited to the examples of such materials cited above.

61. On information and belief, at least since acquiring its January 2023 knowledge of the '244 patent, Saks knows the acts Saks induced its customers to take constitute patent infringement and Saks' encouraging acts result in direct infringement of one or more claims of the '244 patent by its customers.

62. On information and belief, Saks' customers directly infringe at least claim 2 of the '244 patent through their use of the Saks Streaming Video Service.

63. On information and belief, Saks is in violation of 35 U.S.C. § 271(b) and has been, at least since its January 2023 knowledge of the '244 patent, indirectly infringing and continues to indirectly infringe at least claim 2 of the '244 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Saks' users) and possessing specific intent to encourage infringement by Saks' users. The Saks Video Streaming Service is specifically configured to function in accordance with the '244 patent claims.

64. SITO has been damaged by the direct and indirect infringement of Saks, and is suffering and will continue to suffer irreparable harm and damages as a result of this infringement.

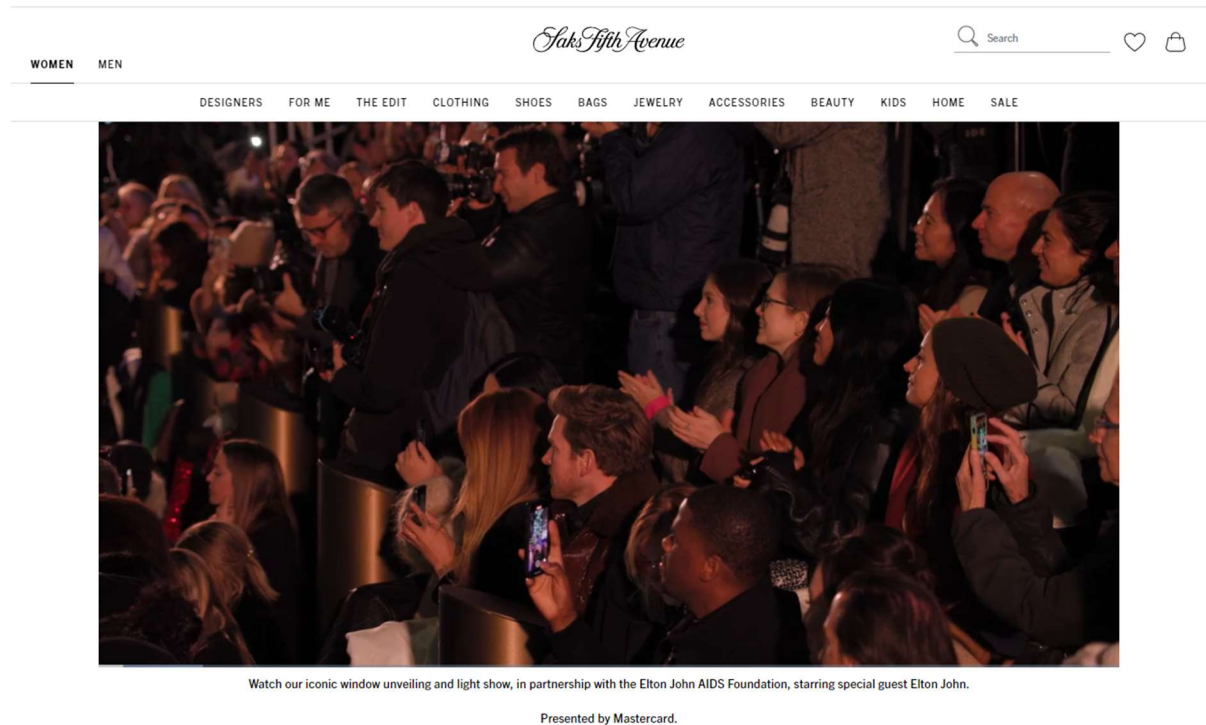
**Count II- Infringement of United States Patent No. 8,015,307**

65. SITO alleges, and incorporates by reference, as if fully set forth here, the preceding paragraphs of this Complaint.

66. Saks directly infringes (literally and/or under the doctrine of equivalents) the '307 patent by using the method covered by at least claim 30 of the '307 patent.

67. On information and belief, and without SITO's approval, authorization and license, Saks owns, controls, operates and uses a system for streaming media that includes the Saks Streaming Platform, as well as other Saks networks, systems, devices, components and/or services for streaming media, that practices and infringes the media streaming method recited in at least claim 30 of the '307 patent.

68. Saks performs a method of streaming video as demonstrated by the example provided below:



See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

69. Saks processes a request (e.g., GET request) for media at a management system (e.g., contained within Saks streaming service server(s)) and builds in response thereto a reservation (e.g., session or connection) comprising a reservation identification (e.g., the reservation identification is appended with the universal resource locator) and



a presentation identification (e.g., M3U8 file), the presentation identification identifying a presentation (e.g., M3U8 file) comprising at least one network distribution rule (e.g., bandwidth) and a media play list (e.g., segment list for the media) comprising a plurality of media names.

The screenshot displays the 'Network' tab of a web browser's developer tools. The left pane shows a list of network requests. The selected request is a GET request to a URL containing a long alphanumeric string. The right pane shows the 'Headers' section for this request, displaying the 'Response Headers' (903 B). The status is '200 OK' and the version is 'HTTP/3'. The response includes various headers such as 'cache-control', 'content-encoding', 'content-length', 'content-type', 'cross-origin-resource-policy', 'date', 'expires', 'p3p', 'pragma', 'server', and 'set-cookie'.

Status	Method	Domain	File	Initi...	Type	Size
200	GET	www.googletag...	a?id=AW-867837652&cv=1&v=3&t=t&pid=246754650&rv=72fc...	html	0 B	
200	GET	8270149.fls.d...	activitysrc=8270149?type=landi0:cat=saks-0:ord=1:num=27 sub...	html	57...	
200	GET	www.google.com	anchor?ar=1&k=6LftSaYAAAAAKUMeZITBWVAsRo1hkbQhnl sub...	html	42...	
200	GET	www.google.com	anchor?ar=1&k=6LftSaYAAAAAKUMeZITBWVAsRo1hkbQhnl sub...	html	43...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=118&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=1298&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=149&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=152&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=170&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=233&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=239&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=264&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=268&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=280&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=299&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=305&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=330&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=333&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=345&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=390&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=400&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=417&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=419&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=440&Availability.prefix=Visi...	js	16...	

493 requests 63.83 MB / 13.88 MB transferred Finish: 40.43 min

Response Headers (903 B)

```

alt-svc: h3="443"; ma=2592000,h3-29="443"; ma=2592000,h3-Q050="443";
ma=2592000,h3-Q046="443"; ma=2592000,h3-Q043="443"; ma=2592000,q
uic="443"; ma=2592000; v="46.43"
cache-control: no-cache, must-revalidate
content-encoding: br
content-length: 299
content-type: text/html; charset=UTF-8
cross-origin-resource-policy: cross-origin
date: Wed, 28 Dec 2022 10:20:50 GMT
expires: Fri, 01 Jan 1990 00:00:00 GMT
p3p: policyref="https://googleads.g.doubleclick.net/pagead/ai/gcn_p3p.xml", CP
="CURa ADMA DeVa TAlO P5Ao P5De OUR IND UNI PUR INT DEM STA PRE COM
NAV OTC NOI DSP COR"
pragma: no-cache
server: cafe
set-cookie: test_cookie=CheckForPermission; expires=Wed, 28-Dec-2022 10:35:5

```

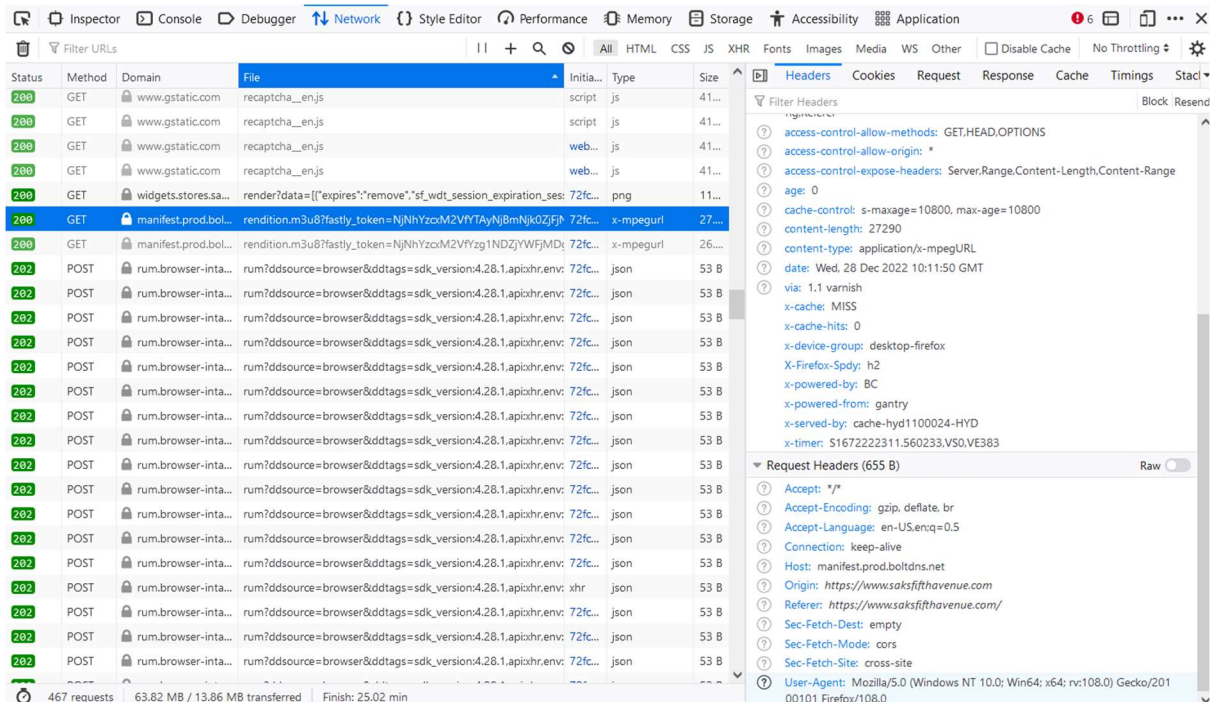
[illegible]

[illegible][illegible]

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>



Saks streaming service server).



[illegible]

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

71. Saks transmits the presentation (e.g., M3U8 file) and reservation data comprising a valid reservation identification (e.g., the reservation identification is appended with the universal resource locator) from the management system (e.g., Saks streaming service server(s)) to a routing processor (e.g., Saks streaming server(s)) and transmits the reservation formatted for reception by the viewer.

Inspector
Console
Debugger
Network
Style Editor
Performance
Memory
Storage
Accessibility
Application

Filter URLs

||

+

Q

All

HTML

CSS

JS

XHR

Fonts

Images

Media

WS

Other

Disable Cache

No Throttling

Status	Method	Domain	File	Initia...	Type	Size	
200	GET	www.gstatic.com	recaptcha_en.js	script	js	41...	
200	GET	www.gstatic.com	recaptcha_en.js	script	js	41...	
200	GET	www.gstatic.com	recaptcha_en.js	web...	js	41...	
200	GET	www.gstatic.com	recaptcha_en.js	web...	js	41...	
200	GET	widgets.stores.a...	render?data=[{"expires":"remove","sf_wdt_session_expiration_ses: 72fc...		png	11...	
200	GET	manifest.prod.bol...	rendition.m3u8?fastly_token=NjNhYzcxMzVhYjBmNjk0ZjFjZjF2fc...		x-mpegurl	27...	
200	GET	manifest.prod.bol...	rendition.m3u8?fastly_token=NjNhYzcxMzVhYjBmNjk0ZjFjZjF2fc...		x-mpegurl	26...	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B	

467 requests

63.82 MB / 13.86 MB transferred

Finish: 25.02 min

Headers

Cookies

Request

Response

Cache

Timings

Stall

Filter Headers

access-control-allow-methods: GET,HEAD,OPTIONS

access-control-allow-origin: \*

access-control-expose-headers: Server,Range,Content-Length,Content-Range

age: 0

cache-control: s-maxage=10800, max-age=10800

content-length: 27290

content-type: application/x-mpegURL

date: Wed, 28 Dec 2022 10:11:50 GMT

via: 1.1 varnish

x-cache: MISS

x-cache-hits: 0

x-device-group: desktop-firefox

X-Firefox-Spdy: h2

x-powered-by: BC

x-powered-from: gantry

x-served-by: cache-hyd1100024-HYD

x-timer: S167222311.560233.VS0.VE383

Request Headers (655 B)

Accept: \*/\*

Accept-Encoding: gzip, deflate, br

Accept-Language: en-US,en;q=0.5

Connection: keep-alive

Host: manifest.prod.boltdns.net

Origin: https://www.saksfitthavenue.com

Referer: https://www.saksfitthavenue.com/

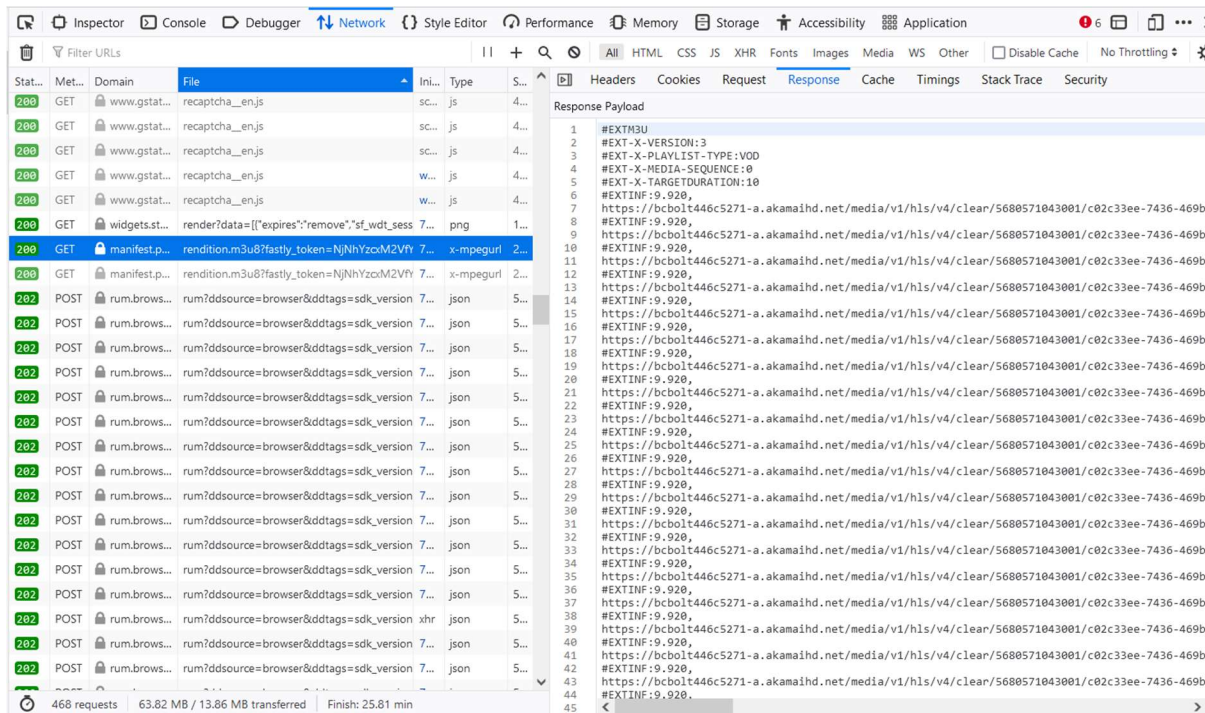
Sec-Fetch-Dest: empty

Sec-Fetch-Mode: cors

Sec-Fetch-Site: cross-site

User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0





See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

72. Saks selects a media switch (e.g., CDN) at the routing processor based on the at least one network distribution rule, the at least one network distribution rule comprising at least one member of a group comprising a capacity rule, a load rule, a bandwidth rule, a resource rule, and a session rule.

32



[illegible]

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

73. Saks determines, at the routing processor, if the media switch (e.g., CDN) is configured to stream the media identified by the media playlist (e.g., segment list contained within the M3U8 file).

Inspector
Console
Debugger
Network
Style Editor
Performance
Memory
Storage
Accessibility
Application

Filter URLs
||
+
Q
🔄
All
HTML
CSS
JS
XHR
Fonts
Images
Media
WS
Other
Disable Cache
No Throttling
⚙️

Status	Method	Domain	File	Initia...	Type	Size
200	GET	www.gstatic.com	recaptcha_en.js	script	js	41...
200	GET	www.gstatic.com	recaptcha_en.js	script	js	41...
200	GET	www.gstatic.com	recaptcha_en.js	web...	js	41...
200	GET	www.gstatic.com	recaptcha_en.js	web...	js	41...
200	GET	widgets.stores.a...	render?data=[{"expires":"remove","sf_wdt_session_expiration_ses: 72f...		png	11...
200	GET	manifest.prod.bol...	rendition.m3u8?fastly_token=NjNhYzcxMzVYV2YyAjBmNjk0ZjFj... 72f...	x-mpegurl		27...
200	GET	manifest.prod.bol...	rendition.m3u8?fastly_token=NjNhYzcxMzVYV2YyAjBmNjk0ZjFj... 72f...	x-mpegurl		26...
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72f...		json	53 B

467 requests
63.82 MB / 13.86 MB transferred
Finish: 25.02 min

Headers
Cookies
Request
Response
Cache
Timings
Stall

Filter Headers
Block
Reset

? access-control-allow-methods: GET,HEAD,OPTIONS
 ? access-control-allow-origin: \*
 ? access-control-expose-headers: Server,Range,Content-Length,Content-Range
 ? age: 0
 ? cache-control: s-maxage=10800, max-age=10800
 ? content-length: 27290
 ? content-type: application/x-mpegURL
 ? date: Wed, 28 Dec 2022 10:11:50 GMT
 ? via: 1.1 varnish
 ? x-cache: MISS
 ? x-cache-hits: 0
 ? x-device-group: desktop-firefox
 ? X-Firefox-Spdy: h2
 ? x-powered-by: BC
 ? x-powered-from: gantry
 ? x-served-by: cache-hyd1100024-HYD
 ? x-timer: S167222311.560233.VS0.VE383

Request Headers (655 B)
Raw

? Accept: \*/\*
 ? Accept-Encoding: gzip, deflate, br
 ? Accept-Language: en-US,en;q=0.5
 ? Connection: keep-alive
 ? Host: manifest.prod.boltdns.net
 ? Origin: https://www.saksfitthavenue.com
 ? Referer: https://www.saksfitthavenue.com/
 ? Sec-Fetch-Dest: empty
 ? Sec-Fetch-Mode: cors
 ? Sec-Fetch-Site: cross-site
 ? User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0

Inspector

Console

Debugger

Network

Style Editor

Performance

Memory

Storage

Accessibility

Application

Filter URLs

|| + 🔍

AllHTMLCSSJSXHRFontsImagesMediaWSOther

☐ Disable Cache

No Throttling

Stat...	Met...	Domain	File	Ini...	Type	S...	Headers	Cookies	Request	Response	Cache	Timings	Stack Trace	Security
200	GET	www.gstatic.com	recaptcha_en.js	sc...	js	4...	<div>Response Payload</div> <pre>1  #EXTM3U 2  #EXT-X-VERSION:3 3  #EXT-X-PLAYLIST-TYPE:VOD 4  #EXT-X-MEDIA-SEQUENCE:0 5  #EXT-X-TARGETDURATION:10 6  #EXTINF:9.920, 7  https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 8  #EXTINF:9.920, 9  https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 10 #EXTINF:9.920, 11 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 12 #EXTINF:9.920, 13 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 14 #EXTINF:9.920, 15 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 16 #EXTINF:9.920, 17 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 18 #EXTINF:9.920, 19 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 20 #EXTINF:9.920, 21 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 22 #EXTINF:9.920, 23 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 24 #EXTINF:9.920, 25 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 26 #EXTINF:9.920, 27 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 28 #EXTINF:9.920, 29 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 30 #EXTINF:9.920, 31 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 32 #EXTINF:9.920, 33 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 34 #EXTINF:9.920, 35 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 36 #EXTINF:9.920, 37 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 38 #EXTINF:9.920, 39 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 40 #EXTINF:9.920, 41 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 42 #EXTINF:9.920, 43 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b 44 #EXTINF:9.920, 45 https://bcbl0t446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b</pre>							
200	GET	www.gstatic.com	recaptcha_en.js	sc...	js	4...								
200	GET	www.gstatic.com	recaptcha_en.js	sc...	js	4...								
200	GET	www.gstatic.com	recaptcha_en.js	w...	js	4...								
200	GET	www.gstatic.com	recaptcha_en.js	w...	js	4...								
200	GET	www.gstatic.com	recaptcha_en.js	w...	js	4...								
200	GET	www.gstatic.com	recaptcha_en.js	w...	js	4...								
200	GET	www.gstatic.com	recaptcha_en.js	w...	js	4...								
200	GET	www.gstatic.com	recaptcha_en.js	w...	js	4...								
200	GET	www.gstatic.com	recaptcha_en.js	w...	js	4...								
200	GET	manifest.p...	rendition.m3u8?fastly_token=NjNhYzozM2YV...	x-mpegurl	2...									
200	GET	manifest.p...	rendition.m3u8?fastly_token=NjNhYzozM2YV...	x-mpegurl	2...									
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	14								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	18								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	22								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	26								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	30								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	34								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	38								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	42								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	46								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	50								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	54								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	58								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	62								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	66								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	70								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	74								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	78								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	82								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	86								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	90								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	94								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	98								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	102								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	106								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	110								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	114								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	118								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	122								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	126								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	130								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	134								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	138								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	142								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	146								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	150								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	154								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	158								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	162								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	166								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	170								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	174								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	178								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	182								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	186								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	190								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	194								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	198								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	202								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	206								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	210								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	214								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	218								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	222								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	226								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	230								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	234								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	238								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	242								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	246								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	250								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	254								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	258								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	262								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	266								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	270								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	274								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	278								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	282								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	286								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	290								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	294								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	298								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	302								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	306								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	310								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	314								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	318								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	322								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	326								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	330								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	334								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	338								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	342								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	346								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	350								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	354								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	358								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	362								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	366								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	370								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	374								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	378								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	382								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	386								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	390								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	394								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	398								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	402								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	406								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	410								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	414								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	418								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	422								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	426								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	430								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	434								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	438								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	442								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	446								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	450								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	454								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	458								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	462								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	466								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	470								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	474								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	478								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	482								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	486								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	490								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	494								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	498								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	502								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	506								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	510								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	514								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	518								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	522								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	526								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	530								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	534								
202	POST	rum.brows...	rum?ddsource=browser&ddtags=sd&version=7...	json	5...	538								
202	POST	rum.brows...	rum?dd											

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

Inspector
Console
Debugger
Network
Style Editor
Performance
Memory
Storage
Accessibility
Application
6
...

Filter URLs
?
||
+
×
Q
All
HTML
CSS
JS
XHR
Fonts
Images
Media
WS
Other
☐ Disable Cache
No Throttling
?

Status	Method	Domain	File	Init...	Type	Size
200	POST	rum.browser-int...	rum?ddsource=browser&ddtags=sd&version=4.28.1.apis&hr=72f...	72f...	json	53 B
200	GET	px.owneriq.net	saksjs	72f...	js	14...
200	GET	cdn.cookiekafar...	Saks_540x540.jpg	72f...	octet-stream	51...
304	GET	4a1bf6197.de.cdn...	scripts	72f...	script	32...
200	GET	us-u.openx.net	sd?cc=1&id=537073059&val=Q7255092541559044781j	eps...	gif	43 B
302	GET	us-u.openx.net	sd?id=537073059&val=Q7255092541559044781j	eps...	gif	43 B
200	GET	widgets.turnto.c...	search-page.85fab630c39f13726fdb49839fabaf1.en_US.js	script	js	56...
200	GET	bbcblot446c5271...	segment11.ts?akamai_token=exp=1672245569~ad=/media/v1 72f...	72f...	mp2t	3.1...
200	GET	bbcblot446c5271...	segment1.ts?akamai_token=exp=1672245570~ad=/media/v1 72f...	72f...	mp2t	31...
200	GET	bbcblot446c5271...	segment1.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	74...
200	GET	bbcblot446c5271...	segment1.ts?akamai_token=exp=1672245603~ad=/media/v1 72f...	72f...	mp2t	17...
200	GET	bbcblot446c5271...	segment10.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	91...
200	GET	bbcblot446c5271...	segment10.ts?akamai_token=exp=1672245603~ad=/media/v1 72f...	72f...	mp2t	17...
200	GET	bbcblot446c5271...	segment11.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	74...
200	GET	bbcblot446c5271...	segment11.ts?akamai_token=exp=1672245603~ad=/media/v1 72f...	72f...	mp2t	17...
200	GET	bbcblot446c5271...	segment12.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	49...
200	GET	bbcblot446c5271...	segment12.ts?akamai_token=exp=1672245603~ad=/media/v1 72f...	72f...	mp2t	17...
200	GET	bbcblot446c5271...	segment13.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	44...
200	GET	bbcblot446c5271...	segment13.ts?akamai_token=exp=1672245603~ad=/media/v1 72f...	72f...	mp2t	17...
200	GET	bbcblot446c5271...	segment14.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	38...
200	GET	bbcblot446c5271...	segment14.ts?akamai_token=exp=1672245603~ad=/media/v1 72f...	72f...	mp2t	17...
200	GET	bbcblot446c5271...	segment15.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	47...
200	GET	bbcblot446c5271...	segment15.ts?akamai_token=exp=1672245603~ad=/media/v1 72f...	72f...	mp2t	17...
200	GET	bbcblot446c5271...	segment16.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	63...

469 requests
63.82 MB / 13.86 MB transferred
Finish: 26.69 min

Headers
Cookies
Request
Response
Cache
Timings
Stack Tr

Filter Headers
Block Reser

GET https://bbcblot446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b-b51c-716d13526265/be274a22-17c2-49f4-99a2-01a9c8237646/5/segment1.ts?akamai\_token=exp=1672245569~ad=/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b-b51c-716d13526265/be274a22-17c2-49f4-99a2-01a9c8237646~hmac=f990d7b25c6b475aa547adb1eb984702941d9ab2b755671625a9207c166138

Status
200 OK

Version
HTTP/1.1

Transferred
3.16 MB (3.16 MB size)

Referrer Policy
strict-origin-when-cross-origin

Response Headers (1.034 kB)
Raw

Accept-Ranges: bytes
Access-Control-Allow-Headers: X-Requested-With,Origin,Range,Accept-Encodin
g,Referer,CMCD-Request,CMCD-Object,CMCD-Status,CMCD-Session
Access-Control-Allow-Methods: GET,HEAD,OPTIONS
Access-Control-Allow-Origin: \*
Access-Control-Expose-Headers: Server,Range,Content-Length,Content-Range,
Akamai-Mon-Luid-Id,Akamai-Mon-Luid-Del,Akamai-Request-BC
Akamai-Mon-Luid-Del: 1315351
Alt-Svc: h3-Q050="443"; ma=93600,quic="443"; ma=93600; v="46,43"
Backend-IP: 13.35.90.38
BC-MID: true
Cache-Control: public, max-age=29672241
Connection: keep-alive
Content-Length: 3164792
Content-Type: video/MP2T
Date: Wed, 28 Dec 2022 10:11:33 GMT
Etag: "511d1266fe0a5e03d095cf7b70e2164"
Expires: Wed, 06 Dec 2023 20:28:54 GMT
Last-Modified: Fri, 01 Jan 2016 00:00:00 GMT



The screenshot displays the Network tab of a web browser's developer tools. The left pane shows a list of network requests, with the selected request being a GET request to a video segment. The right pane shows the response headers for this request, including Cache-Control, Content-Type, Date, ETag, Expires, Last-Modified, X-Amz-CF-Id, X-Amz-CF-Pop, X-Cache-Hits, X-Powered-By, X-Powered-From, X-Served-By, and X-Timer. The request headers section is also visible, showing Accept, Accept-Encoding, Accept-Language, Connection, Host, Origin, Referer, Sec-Fetch-Dest, Sec-Fetch-Mode, Sec-Fetch-Site, and User-Agent.

Status	Method	Domain	File	Initi...	Type	Size
304	GET	4a161b1a97/de.cd...	script.js	script	js	32...
200	GET	us-u.openx.net	sd7cc=1&id=537073059&val=Q7255092541559044781J	eps...	gif	43 B
302	GET	us-u.openx.net	sd7id=537073059&val=Q7255092541559044781J	eps...	gif	43 B
200	GET	widgets.turnto.c...	search-page.85faba630c39f13726fdb49839afba1.en_US.js	script	js	56...
200	GET	bcbolt446c5271...	segment1.ts?akamai_token=exp=1672245569~ad=/media/v1 72fc...	mp2t	3.1...	
200	GET	bcbolt446c5271...	segment11.ts?akamai_token=exp=1672245570~ad=/media/v1 72fc...	mp2t	31...	
200	GET	bcbolt446c5271...	segment11.ts?akamai_token=exp=1672245598~ad=/media/v1 72fc...	mp2t	74...	
200	GET	bcbolt446c5271...	segment11.ts?akamai_token=exp=1672245603~ad=/media/v1 72fc...	mp2t	17...	
200	GET	bcbolt446c5271...	segment10.ts?akamai_token=exp=1672245598~ad=/media/v1 72fc...	mp2t	91...	
200	GET	bcbolt446c5271...	segment10.ts?akamai_token=exp=1672245603~ad=/media/v1 72fc...	mp2t	17...	
200	GET	bcbolt446c5271...	segment11.ts?akamai_token=exp=1672245598~ad=/media/v1 72fc...	mp2t	74...	
200	GET	bcbolt446c5271...	segment11.ts?akamai_token=exp=1672245603~ad=/media/v1 72fc...	mp2t	17...	
200	GET	bcbolt446c5271...	segment12.ts?akamai_token=exp=1672245598~ad=/media/v1 72fc...	mp2t	49...	
200	GET	bcbolt446c5271...	segment12.ts?akamai_token=exp=1672245603~ad=/media/v1 72fc...	mp2t	17...	
200	GET	bcbolt446c5271...	segment13.ts?akamai_token=exp=1672245598~ad=/media/v1 72fc...	mp2t	44...	
200	GET	bcbolt446c5271...	segment13.ts?akamai_token=exp=1672245603~ad=/media/v1 72fc...	mp2t	17...	
200	GET	bcbolt446c5271...	segment14.ts?akamai_token=exp=1672245598~ad=/media/v1 72fc...	mp2t	38...	
200	GET	bcbolt446c5271...	segment14.ts?akamai_token=exp=1672245598~ad=/media/v1 72fc...	mp2t	17...	
200	GET	bcbolt446c5271...	segment15.ts?akamai_token=exp=1672245598~ad=/media/v1 72fc...	mp2t	47...	
200	GET	bcbolt446c5271...	segment15.ts?akamai_token=exp=1672245603~ad=/media/v1 72fc...	mp2t	17...	
200	GET	bcbolt446c5271...	segment16.ts?akamai_token=exp=1672245598~ad=/media/v1 72fc...	mp2t	63...	
200	GET	bcbolt446c5271...	segment16.ts?akamai_token=exp=1672245603~ad=/media/v1 72fc...	mp2t	16...	
200	GET	bcbolt446c5271...	segment17.ts?akamai_token=exp=1672245598~ad=/media/v1 72fc...	mp2t	62...	
200	GET	bcbolt446c5271...	segment17.ts?akamai_token=exp=1672245603~ad=/media/v1 72fc...	mp2t	17...	
200	GET	bcbolt446c5271...	segment18.ts?akamai_token=exp=1672245598~ad=/media/v1 72fc...	mp2t	58...	

476 requests | 63.82 MB / 13.86 MB transferred | Finish: 30.94 min

**Response Headers (751 B)**

- Cache-Control: public, max-age=29672241
- Connection: keep-alive
- Content-Length: 3164792
- Content-Type: video/MP2T
- Date: Wed, 28 Dec 2022 10:11:33 GMT
- ETag: "511d1266fe0a5e003d095c7fb70e2164"
- Expires: Wed, 06 Dec 2023 20:28:54 GMT
- Last-Modified: Fri, 01 Jan 2016 00:00:00 GMT
- X-Amz-CF-Id: qmJ9DxzZvCivLDdt6CynYMSwTLySjyalTYHCw9EshW\_nrU\_bM7s0z
- X-Amz-CF-Pop: JFK50-P8
- X-Cache-Hits: 1
- X-Powered-By: BC
- X-Powered-From: gantry
- X-Served-By: cache-ewr18140-EWR
- X-Timer: S1672217999.582938.VS0.VE15

**Request Headers (751 B)**

- Accept: \*/\*
- Accept-Encoding: gzip, deflate, br
- Accept-Language: en-US,en;q=0.5
- Connection: keep-alive
- Host: bcbolt446c5271-a.akamaihd.net
- Origin: https://www.saksfifthavenue.com
- Referer: https://www.saksfifthavenue.com/
- Sec-Fetch-Dest: empty
- Sec-Fetch-Mode: cors
- Sec-Fetch-Site: cross-site
- User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

74. Saks transmits the reservation data from the routing processor to the media switch (e.g., CDN) if the media switch is configured, at least initially, to stream the media for the media play list.

Inspector
Console
Debugger
Network
Style Editor
Performance
Memory
Storage
Accessibility
Application

Filter URLs

||

+

Q

All

HTML

CSS

JS

XHR

Fonts

Images

Media

WS

Other

Disable Cache

No Throttling

Status	Method	Domain	File	Initia...	Type	Size
200	GET	www.gstatic.com	recaptcha_en.js	script	js	41...
200	GET	www.gstatic.com	recaptcha_en.js	script	js	41...
200	GET	www.gstatic.com	recaptcha_en.js	web...	js	41...
200	GET	www.gstatic.com	recaptcha_en.js	web...	js	41...
200	GET	widgets.stores.a...	render?data=[{"expires":"remove","sf_wdt_session_expiration_ses: 72fc...		png	11...
200	GET	manifest.prod.bol...	rendition.m3u8?fastly_token=NjNhYzcxMzVhYjBmNjk0ZjFjZjF2f2fc...	x-mpegurl		27...
200	GET	manifest.prod.bol...	rendition.m3u8?fastly_token=NjNhYzcxMzVhYjBmNjk0ZjFjZjF2f2fc...	x-mpegurl		26...
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B

467 requests

63.82 MB / 13.86 MB transferred

Finish: 25.02 min

Headers

Cookies

Request

Response

Cache

Timings

Stall

Filter Headers

access-control-allow-methods: GET,HEAD,OPTIONS

access-control-allow-origin: \*

access-control-expose-headers: Server,Range,Content-Length,Content-Range

age: 0

cache-control: s-maxage=10800, max-age=10800

content-length: 27290

content-type: application/x-mpegURL

date: Wed, 28 Dec 2022 10:11:50 GMT

via: 1.1 varnish

x-cache: MISS

x-cache-hits: 0

x-device-group: desktop-firefox

X-Firefox-Spdy: h2

x-powered-by: BC

x-powered-from: gantry

x-served-by: cache-hyd1100024-HYD

x-timer: S167222311.560233.VS0.VE383

Request Headers (655 B)

Accept: \*/\*

Accept-Encoding: gzip, deflate, br

Accept-Language: en-US,en;q=0.5

Connection: keep-alive

Host: manifest.prod.boltdns.net

Origin: https://www.saksfitthavenue.com

Referer: https://www.saksfitthavenue.com/

Sec-Fetch-Dest: empty

Sec-Fetch-Mode: cors

Sec-Fetch-Site: cross-site

User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0

[illegible]

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

75. Saks validates the reservation identification with the reservation data at the media switch and for each media name on the media play list, streaming at least partially the media identified by the media name if the reservation identification is valid.



39

The screenshot shows the Network tab of a web browser's developer tools. The list of requests includes several GET requests to 'www.gstatic.com' for 'recaptcha\_en.js' and a GET request to 'manifest.p...' for 'rendition.m3u8?fastly\_token=NjNhYzoiM2VYf...'. The selected request is a GET to 'manifest.p...' for 'rendition.m3u8?fastly\_token=NjNhYzoiM2VYf...'. The response payload is shown in the right pane, displaying a list of headers and a body containing a list of URLs and a list of headers.

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

The screenshot shows the Network tab of a web browser's developer tools. The list of requests includes several GET requests to 'www.gstatic.com' for 'recaptcha\_en.js' and a GET request to 'manifest.p...' for 'rendition.m3u8?fastly\_token=NjNhYzoiM2VYf...'. The selected request is a GET to 'manifest.p...' for 'rendition.m3u8?fastly\_token=NjNhYzoiM2VYf...'. The response headers are shown in the right pane, displaying a list of headers including 'Accept-Ranges', 'Access-Control-Allow-Headers', 'Access-Control-Allow-Methods', 'Access-Control-Allow-Origin', 'Access-Control-Expose-Headers', 'Cache-Control', 'Connection', 'Content-Length', 'Content-Type', 'Date', 'ETag', 'Expires', and 'Last-Modified'.



The screenshot shows a web browser's developer tools with the 'Network' tab selected. A list of network requests is displayed, with the selected request being a GET request to 'segment1.ts?akamai\_token=exp=1672245598~ad=/media/v1 72fc...' from 'bcbolt446c5271...'. The 'Headers' panel on the right shows the request headers, including 'Accept: \*/\*', 'Accept-Encoding: gzip, deflate, br', 'Accept-Language: en-US,en;q=0.5', 'Connection: keep-alive', 'Host: bcbolt446c5271-a.akamaihd.net', 'Origin: https://www.saksfifthavenue.com', 'Referer: https://www.saksfifthavenue.com', 'Sec-Fetch-Dest: empty', 'Sec-Fetch-Mode: cors', 'Sec-Fetch-Site: cross-site', and 'User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0'.

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

76. On information and belief, Saks has been on notice of the '307 patent at least as early as January 26, 2023, when Saks' in-house counsel responded to SITO's counsel's January 9, 2023 letter concerning Saks' infringement of the patents-in-suit.

77. On information and belief, at least since January 26, 2023, Saks knowingly encouraged and continues to encourage, its customers to directly infringe one or more claims of the '307 patent, including by Saks' actions that include, without limitation, instructing and encouraging its customers to use the Saks Video Streaming Services through the publishing, distribution, and propagation of targeted user emails, shopping offers, support documents, blog posts, live events, and instructions, including but not limited to the examples of such materials cited above.

78. On information and belief, at least since acquiring its January 2023 knowledge of the '307 patent, Saks knows the acts Saks induced its customers to take constitute patent infringement and Saks' encouraging acts result in direct infringement of one or more claims of the '307 patent by its customers.

79. On information and belief, Saks' customers directly infringe at least claim 30 of the '307 patent through their use of the Saks Video Streaming Service.

80. On information and belief, Saks is in violation of 35 U.S.C. § 271(b) and has been, at least since its January 2023 knowledge of the '307 patent, indirectly infringing and continues to indirectly infringe at least claim 30 of the '307 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Saks' users) and possessing specific intent to encourage infringement by Saks' users. The Saks Video Streaming Service is specifically configured to function in accordance with the '307 patent claims.

81. SITO has been damaged by the direct and indirect infringement of Saks, and is suffering and will continue to suffer irreparable harm and damages as a result of this infringement.

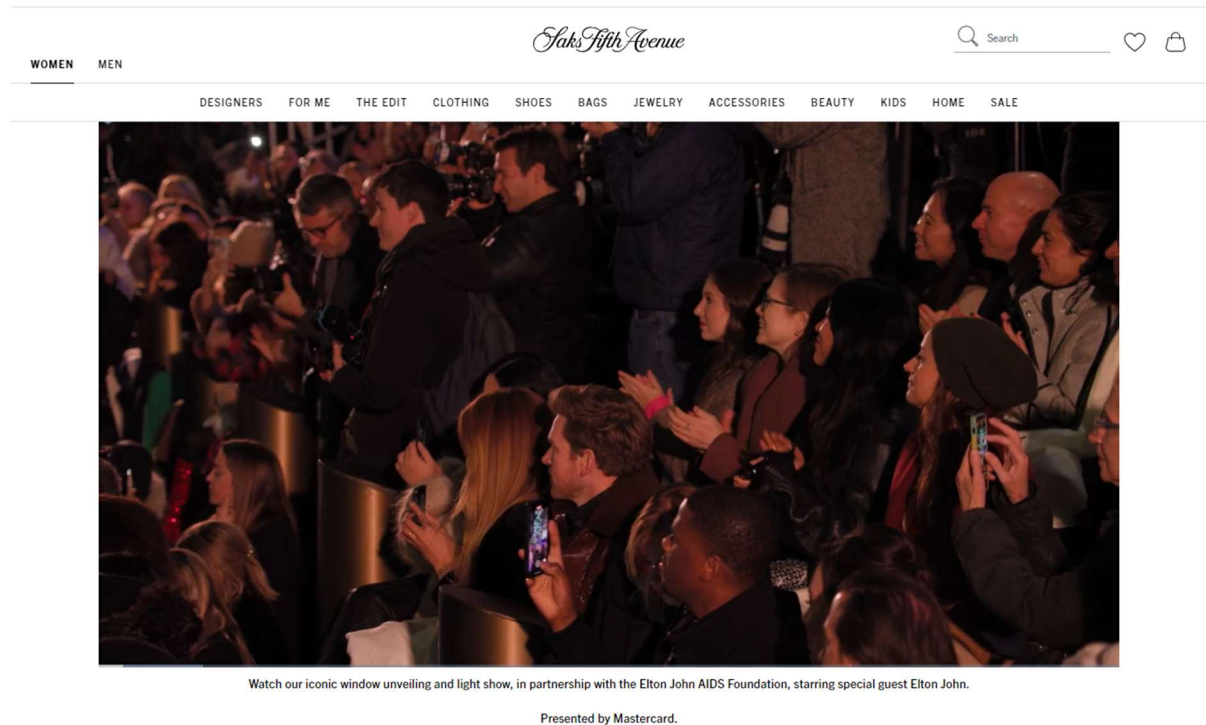
**Count III- Infringement of United States Patent No. 8,554,940**

82. SITO alleges, and incorporates by reference, as if fully set forth here, the preceding paragraphs of this Complaint.

83. Saks directly infringes (literally and/or under the doctrine of equivalents) the '940 patent by using the method covered by at least claim 1 of the '940 patent.

84. On information and belief, and without SITO's approval, authorization and license, Saks owns, controls, operates and uses a system for streaming media that includes the Saks Streaming Platform, as well as other Saks networks, systems, devices, components and/or services for streaming media, that practices and infringes the media streaming method recited in at least claim 1 of the '940 patent.

85. Saks performs a method of streaming video as demonstrated by the example provided below:



See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

86. Saks processes a request (e.g., GET request) at a reservation system (e.g., Saks Streaming Service server(s)) to identify at least one program (e.g., requested media or video) comprising at least one program routing rule (e.g., geographic restrictions) and a list of media from which at least a portion of the media is identified.

The screenshot shows the Chrome DevTools Network tab. The top panel lists 493 requests. The selected request is a GET to `https://8270149.fs.doubleclick.net/activitysrc=8270149?type=landi0cat=saks-Oord=1num=27 sub...`. The right panel shows the response headers, including `alt-svc`, `cache-control`, `content-encoding`, `content-length`, `content-type`, `cross-origin-resource-policy`, `date`, `expires`, `p3p`, `pragma`, `server`, and `set-cookie`.

Status	Method	Domain	File	Initi...	Type	Size
200	GET	www.googletag...	a?id=AW-867837652&cv=1&v=3&t=t&pid=246754650&rv=72fc...	html	0 B	
200	GET	8270149.fs.d...	activitysrc=8270149?type=landi0cat=saks-Oord=1num=27 sub...	html	57...	
200	GET	www.google.com	anchor?ar=1&k=6LftSaYAAAAAKUMeZITBWVAsRo1hkbQhnl sub...	html	42...	
200	GET	www.google.com	anchor?ar=1&k=6LftSaYAAAAAKUMeZITBWVAsRo1hkbQhnl sub...	html	43...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=11&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=129&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=149&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=152&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=170&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=233&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=239&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=264&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=268&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=280&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=299&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=305&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=330&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=333&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=345&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=390&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=400&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=417&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=419&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=440&Availability.prefix=Visi...	js	16...	

493 requests | 63.83 MB / 13.88 MB transferred | Finish: 40.43 min

The screenshot shows the Chrome DevTools Network tab. The top panel lists 493 requests. The selected request is a GET to `https://8270149.fs.doubleclick.net/activitysrc=8270149?type=landi0cat=saks-Oord=1num=27 sub...`. The right panel shows the request headers, including `Accept`, `Accept-Encoding`, `Accept-Language`, `Alt-Used`, `Connection`, `Host`, `Referer`, `Sec-Fetch-Dest`, `Sec-Fetch-Mode`, `Sec-Fetch-Site`, `Upgrade-Insecure-Requests`, and `User-Agent`.

Status	Method	Domain	File	Initi...	Type	Size
200	GET	www.googletag...	a?id=AW-867837652&cv=1&v=3&t=t&pid=246754650&rv=72fc...	html	0 B	
200	GET	8270149.fs.d...	activitysrc=8270149?type=landi0cat=saks-Oord=1num=27 sub...	html	57...	
200	GET	www.google.com	anchor?ar=1&k=6LftSaYAAAAAKUMeZITBWVAsRo1hkbQhnl sub...	html	42...	
200	GET	www.google.com	anchor?ar=1&k=6LftSaYAAAAAKUMeZITBWVAsRo1hkbQhnl sub...	html	43...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=11&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=129&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=149&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=152&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=170&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=233&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=239&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=264&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=268&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=280&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=299&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=305&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=330&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=333&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=345&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=390&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=400&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=417&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=419&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=440&Availability.prefix=Visi...	js	16...	

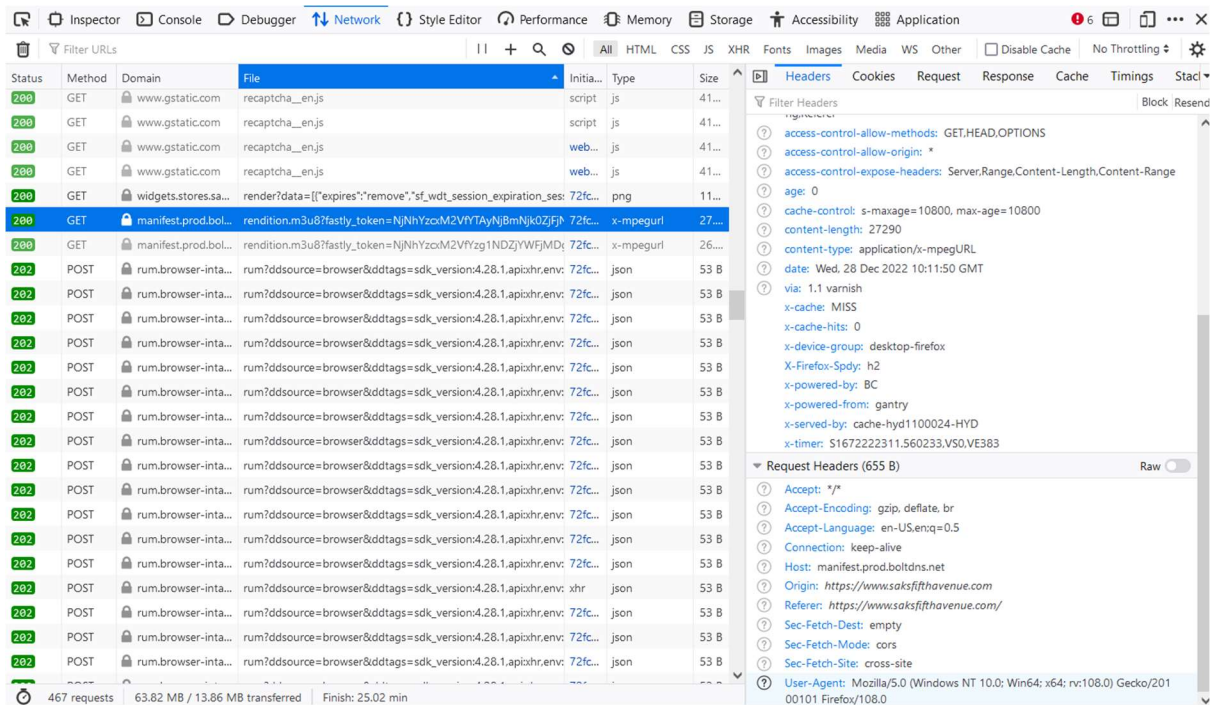
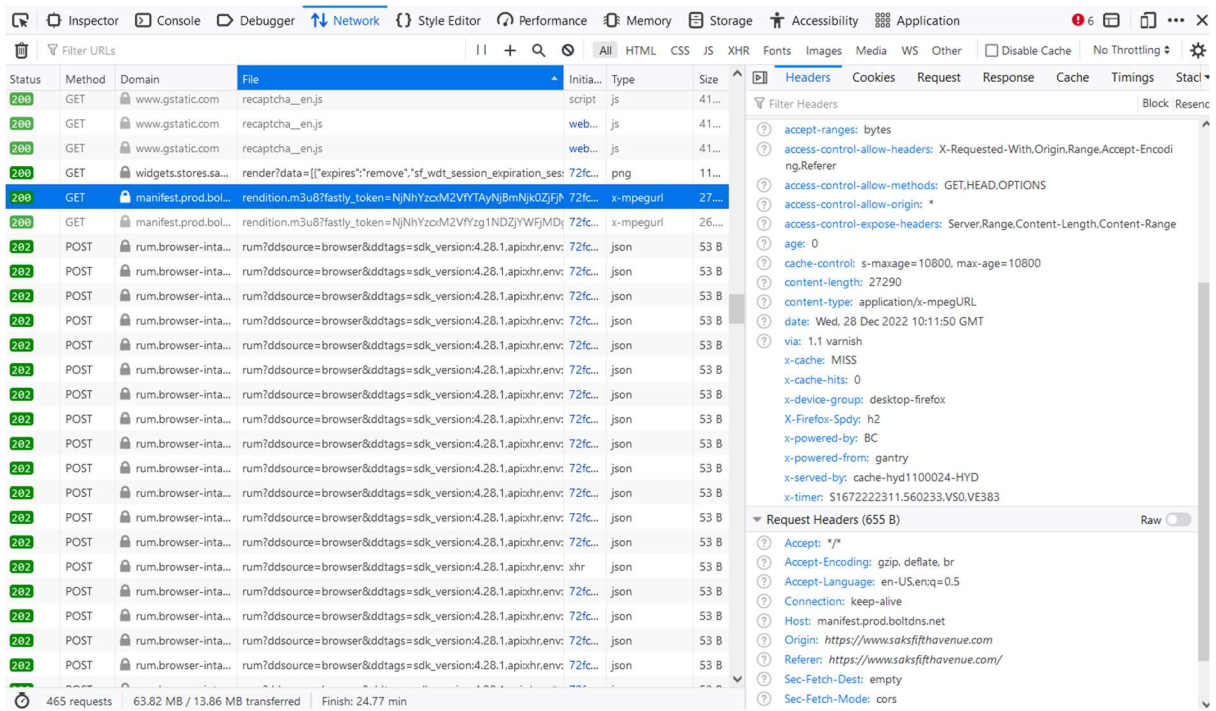
493 requests | 63.83 MB / 13.88 MB transferred | Finish: 40.43 min

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

87. Saks processes the request (e.g., GET request) with the at least one program routing rule and the list of media of the program to generate a presentation



(e.g., M3U8 file) identifying the at least the portion of the media, the presentation being in a format receivable by the viewer.



The screenshot shows a network request for a video file. The 'Response' tab is selected, displaying the video file's data. The 'Headers' tab shows various headers, including 'Content-Type: video/mp4' and 'Content-Length: 10'. The 'Status' column shows a 200 status code for the request.

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

88. Saks generates and transmits a reservation (e.g., session or connection) associated with the presentation (e.g., M3U8 file) from the reservation system.

The screenshot shows a network request for a video file. The 'Headers' tab is selected, displaying the video file's data. The 'Status' column shows a 200 status code for the request. The 'Response' tab shows the video file's data, including the 'Content-Type: video/mp4' and 'Content-Length: 10' headers.



[illegible]

The screenshot displays the Network tab of a web browser's developer tools. The list of requests shows a series of GET requests to various domains, including www.gstatic.com and manifest.prod.boltdns.net. The selected request is a GET to manifest.prod.boltdns.net with a file name of rendition.m3u8?fastly\_token=NjNhYzcxM2VhYzYyZG1hZDZlYWFjMDY2ZmNmNjA0ZjFh. The Headers panel on the right shows the following request headers:

- Accept: \*/\*
- Accept-Encoding: gzip, deflate, br
- Accept-Language: en-US,en;q=0.5
- Connection: keep-alive
- Host: manifest.prod.boltdns.net
- Origin: https://www.saksfifthavenue.com
- Referer: https://www.saksfifthavenue.com/
- Sec-Fetch-Dest: empty
- Sec-Fetch-Mode: cors
- Sec-Fetch-Site: cross-site
- User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0

The screenshot displays the Network tab of a web browser's developer tools. The list of requests shows a series of GET requests to various domains, including www.gstatic.com and manifest.prod.boltdns.net. The selected request is a GET to manifest.prod.boltdns.net with a file name of rendition.m3u8?fastly\_token=NjNhYzcxM2VhYzYyZG1hZDZlYWFjMDY2ZmNmNjA0ZjFh. The Response panel on the right shows the response payload, which is a list of media URLs:

```

1 #EXTM3U
2 #EXT-X-VERSION:3
3 #EXT-X-PLAYLIST-TYPE:VOD
4 #EXT-X-MEDIA-SEQUENCE:0
5 #EXT-X-TARGETDURATION:10
6 #EXTINF:9.920,
7 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
8 #EXTINF:9.920,
9 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
10 #EXTINF:9.920,
11 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
12 #EXTINF:9.920,
13 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
14 #EXTINF:9.920,
15 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
16 #EXTINF:9.920,
17 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
18 #EXTINF:9.920,
19 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
20 #EXTINF:9.920,
21 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
22 #EXTINF:9.920,
23 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
24 #EXTINF:9.920,
25 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
26 #EXTINF:9.920,
27 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
28 #EXTINF:9.920,
29 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
30 #EXTINF:9.920,
31 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
32 #EXTINF:9.920,
33 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
34 #EXTINF:9.920,
35 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
36 #EXTINF:9.920,
37 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
38 #EXTINF:9.920,
39 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
40 #EXTINF:9.920,
41 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
42 #EXTINF:9.920,
43 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b
44 #EXTINF:9.920,
45 https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b

```

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

89. On information and belief, Saks receives the reservation (e.g., session, connection) at a routing processor (e.g., Saks streaming server(s)) and, at the routing processor (e.g., Saks streaming server(s)) determines a priority for a plurality of media



switches (e.g., edge servers of the CDN) available to stream the at least the portion of the media (e.g., media segments contained within the M3U8 file) identified in the presentation (e.g., M3U8 file) based on the at least one program routing rule.

90. On information and belief, Saks receives the reservation (e.g., session, connection) at a routing processor (e.g., Saks streaming server(s)) and, at the routing processor (e.g., Saks streaming server(s)) selects at least one of the plurality of media switches (e.g., edge servers of the CDN) to stream the at least the portion of the media (e.g., media segments contained within the M3U8 file) identified in the presentation (e.g., M3U8 file) based on the priority.

91. On information and belief, Saks receives the reservation (e.g., session, connection) at a routing processor (e.g., Saks streaming server(s)) and, at the routing processor (e.g., Saks streaming server(s)) generates an address (e.g., URL) of the selected at least one of the plurality of media switches (e.g., e.g., edge servers of the CDN) in a format receivable by the viewer.

50

[illegible]

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

Inspector
Console
Debugger
Network
Style Editor
Performance
Memory
Storage
Accessibility
Application
6
...

Filter URLs
?
||
+
×
Q
All
HTML
CSS
JS
XHR
Fonts
Images
Media
WS
Other
☐ Disable Cache
No Throttling
?

Status	Method	Domain	File	Init...	Type	Size
200	POST	rum.browser-int...	rum?ddsource=browser&ddtags=sd&version&4.28.1.apis&hr=72f...	72f...	json	53 B
200	GET	px.owneriq.net	saksjs	72f...	js	14...
200	GET	cdn.cookiekafar...	Saks_540x540.jpg	72f...	octet-stream	51...
304	GET	4a1bf6197.de.cdn...	scripts	72f...	script	32...
200	GET	us-u.openx.net	sd?cc=1&id=537073059&val=Q7255092541559044781j	eps...	gif	43 B
302	GET	us-u.openx.net	sd?id=537073059&val=Q7255092541559044781j	eps...	gif	43 B
200	GET	widgets.turnto.c...	search-page.85fab630c39f13726fdb49839fabaf1.en_US.js	script	js	56...
200	GET	bbcblot446c5271...	segment11.ts?akamai_token=exp=1672245569~ad=/media/v1 72f...	72f...	mp2t	3.1...
200	GET	bbcblot446c5271...	segment1.ts?akamai_token=exp=1672245570~ad=/media/v1 72f...	72f...	mp2t	31...
200	GET	bbcblot446c5271...	segment1.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	74...
200	GET	bbcblot446c5271...	segment1.ts?akamai_token=exp=1672245603~ad=/media/v1 72f...	72f...	mp2t	17...
200	GET	bbcblot446c5271...	segment10.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	91...
200	GET	bbcblot446c5271...	segment10.ts?akamai_token=exp=1672245603~ad=/media/v1 72f...	72f...	mp2t	17...
200	GET	bbcblot446c5271...	segment11.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	74...
200	GET	bbcblot446c5271...	segment11.ts?akamai_token=exp=1672245603~ad=/media/v1 72f...	72f...	mp2t	17...
200	GET	bbcblot446c5271...	segment12.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	49...
200	GET	bbcblot446c5271...	segment12.ts?akamai_token=exp=1672245603~ad=/media/v1 72f...	72f...	mp2t	17...
200	GET	bbcblot446c5271...	segment13.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	44...
200	GET	bbcblot446c5271...	segment13.ts?akamai_token=exp=1672245603~ad=/media/v1 72f...	72f...	mp2t	17...
200	GET	bbcblot446c5271...	segment14.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	38...
200	GET	bbcblot446c5271...	segment14.ts?akamai_token=exp=1672245603~ad=/media/v1 72f...	72f...	mp2t	17...
200	GET	bbcblot446c5271...	segment15.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	47...
200	GET	bbcblot446c5271...	segment15.ts?akamai_token=exp=1672245603~ad=/media/v1 72f...	72f...	mp2t	17...
200	GET	bbcblot446c5271...	segment16.ts?akamai_token=exp=1672245598~ad=/media/v1 72f...	72f...	mp2t	63...

469 requests
63.82 MB / 13.86 MB transferred
Finish: 26.69 min

Headers
Cookies
Request
Response
Cache
Timings
Stack Tr

Filter Headers
Block Reser

GET https://bbcblot446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b-b51c-716d13526265/be274a22-17c2-49f4-99a2-01a9c8237646/5/segment1.ts?akamai\_token=exp=1672245569~ad=/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b-b51c-716d13526265/be274a22-17c2-49f4-99a2-01a9c8237646~hmac=f9d07b25c6b475aa547adb1eb984702941d9ab2b755671625a9207c166138

Status
200 OK

Version
HTTP/1.1

Transferred
3.16 MB (3.16 MB size)

Referrer Policy
strict-origin-when-cross-origin

Response Headers (1.034 kB)
Raw

Accept-Ranges: bytes
Access-Control-Allow-Headers: X-Requested-With,Origin,Range,Accept-Encodin
g,Referer,CMCD-Request,CMCD-Object,CMCD-Status,CMCD-Session
Access-Control-Allow-Methods: GET,HEAD,OPTIONS
Access-Control-Allow-Origin: \*
Access-Control-Expose-Headers: Server,Range,Content-Length,Content-Range,
Akamai-Mon-Luid-Id,Akamai-Mon-Luid-Del,Akamai-Request-BC
Akamai-Mon-Luid-Del: 1315351
Alt-Svc: h3-Q050="443"; ma=93600,quic="443"; ma=93600; v="46,43"
Backend-IP: 13.35.90.38
BC-MID: true
Cache-Control: public, max-age=29672241
Connection: keep-alive
Content-Length: 3164792
Content-Type: video/MP2T
Date: Wed, 28 Dec 2022 10:11:33 GMT
Etag: "511d1266fe0a5e03d095cf7b70e2164"
Expires: Wed, 06 Dec 2023 20:28:54 GMT
Last-Modified: Fri, 01 Jan 2016 00:00:00 GMT



The screenshot shows a web browser's developer tools with the 'Network' tab selected. A list of network requests is displayed, with the selected request being a GET request to 'segment1.ts?akamai\_token=exp=1672245569~ad=/media/v1 72fc...' from 'bcbolt446c5271...'. The 'Headers' panel on the right shows the request headers, including 'Accept: \*/\*', 'Accept-Encoding: gzip, deflate, br', 'Accept-Language: en-US,en;q=0.5', 'Connection: keep-alive', 'Host: bcbolt446c5271-a.akamaihd.net', 'Origin: https://www.saksfifthavenue.com', 'Referer: https://www.saksfifthavenue.com/', 'Sec-Fetch-Dest: empty', 'Sec-Fetch-Mode: cors', 'Sec-Fetch-Site: cross-site', and 'User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0'.

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

92. On information and belief, Saks has been on notice of the '940 patent at least as early as January 26, 2023, when Saks' in-house counsel responded to SITO's counsel's January 9, 2023 letter concerning Saks' infringement of the patents-in-suit.

93. On information and belief, at least since January 26, 2023, Saks knowingly encouraged and continues to encourage, its customers to directly infringe one or more claims of the '940 patent, including by Saks' actions that include, without limitation, instructing and encouraging its customers to use the Saks Video Streaming Services through the publishing, distribution, and propagation of targeted user emails, shopping offers, support documents, blog posts, live events, and instructions, including but not limited to the examples of such materials cited above.



94. On information and belief, at least since acquiring its January 2023 knowledge of the '940 patent, Saks knows the acts Saks induced its customers to take constitute patent infringement and Saks' encouraging acts result in direct infringement of one or more claims of the '940 patent by its customers.

95. On information and belief, Saks' customers directly infringe at least claim 1 of the '940 patent through their use of the Saks Video Streaming Service.

96. On information and belief, Saks is in violation of 35 U.S.C. § 271(b) and has been, at least since its January 2023 knowledge of the '940 patent, indirectly infringing and continues to indirectly infringe at least claim 1 of the '940 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Saks' users) and possessing specific intent to encourage infringement by Saks' users. The Saks Video Streaming Service is specifically configured to function in accordance with the '940 patent claims.

97. SITO has been damaged by the direct and indirect infringement of Saks, and is suffering and will continue to suffer irreparable harm and damages as a result of this infringement.

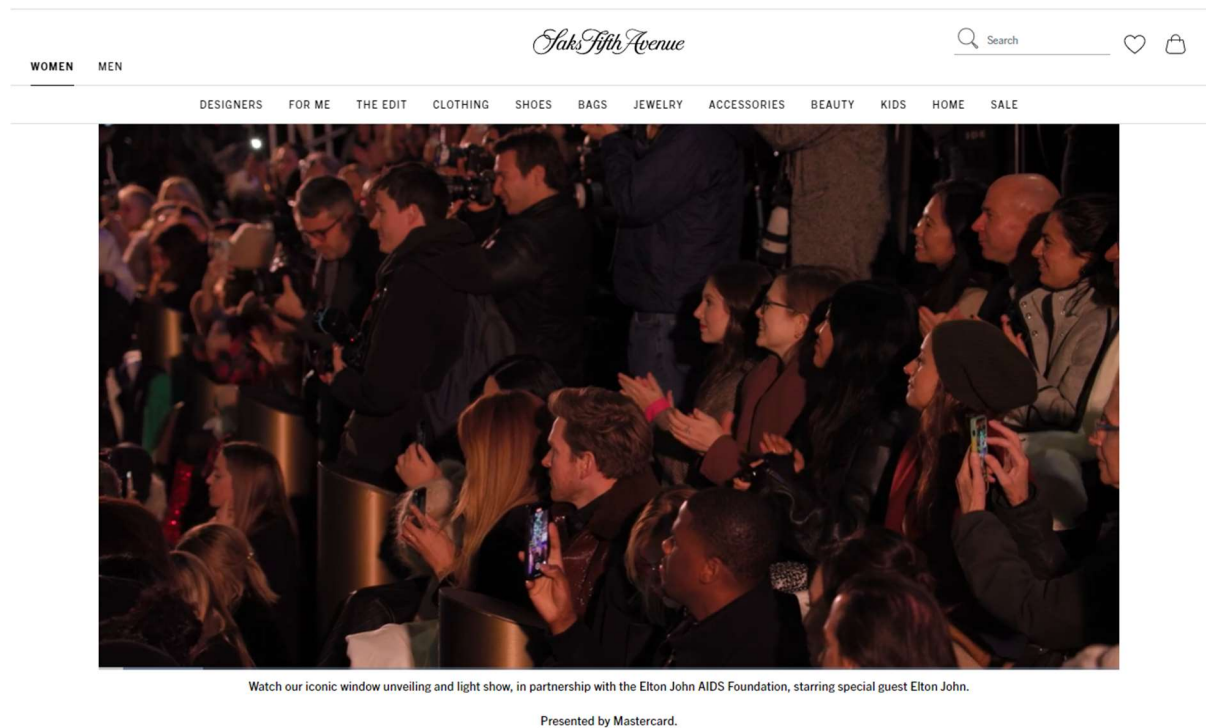
**Count IV – Infringement of United States Patent No. 9,349,138**

98. SITO alleges, and incorporates by reference, as if fully set forth here, the preceding paragraphs of this Complaint.

99. Saks directly infringes (literally and/or under the doctrine of equivalents) claim 11 of the '138 patent.

100. On information and belief, and without SITO's approval, authorization and license, Saks owns, controls, operates and uses a system for streaming media that includes the Saks Streaming Platform, as well as other Saks networks, systems, devices, components and/or services for streaming media, that practices and infringes claim 11 of the '138 patent.

101. Saks performs a method for managing streaming of video content to a client device (e.g., personal computer, mobile device, and/or television) as demonstrated by the example provided below:



See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

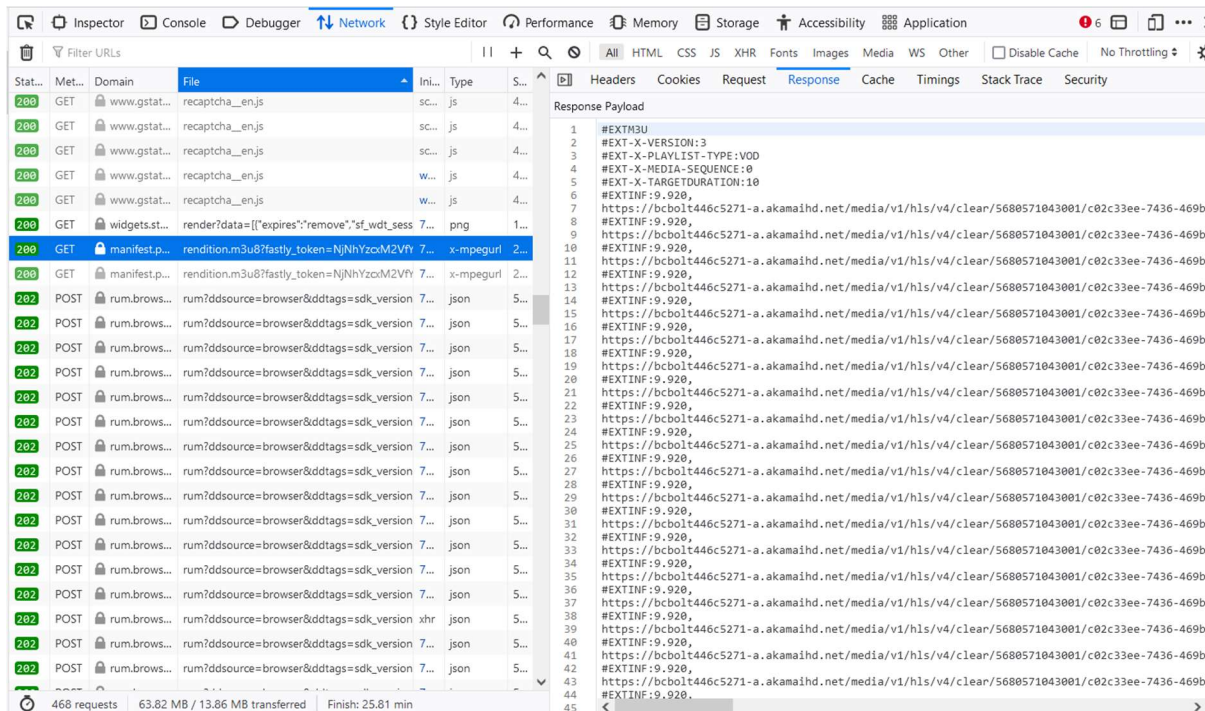
102. On information and belief, Saks causes a media switch (e.g., Content delivery network, CDN) to generate a media switch state model, the media switch state model comprises at least one state change for at least one state (e.g., streaming paused,

resumed, or skipped to the next segment) occurring for a session of streaming the media to at least one of a plurality of viewers (e.g., client devices), the at least one state change comprising at least one member selected from a group consisting of a session initiation state, a viewing event state, and a session termination state, each comprising a reservation identification (e.g., the reservation identification is appended with the universal resource locator) for the reservation.

103. On information and belief, Saks generates a routing processor state model of a routing processor (e.g., contained within the Saks streaming server), the routing processor state model comprising an identification of the media switch (e.g., CDN) selected to stream the media and the reservation identification (e.g., the reservation identification is appended with the universal resource locator) to the at least one of a plurality of viewers, wherein the media switch is selected based on at least one network distribution rule (e.g., bandwidth supported by the client device).

56





See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

104. On information and belief, Saks receives, by at least one processor, a routing processor identification (e.g., contained within the Saks streaming server) and a reservation identification for the reservation (e.g., the reservation identification is appended with the universal resource locator), the routing processor identification identifying a routing processor to select a media switch to stream the media to at least one of a plurality of viewers, the routing processor selecting the media switch based on the at least one network distribution rule.

The screenshot shows the Chrome DevTools Network tab with a list of 465 requests. The selected request is a GET request to `manifest.prod.bol...` with a status of 200. The Headers panel on the right shows the following details:

- Filter Headers:** Block, Resend
- Request Headers (655 B):**
  - Accept: \*/\*
  - Accept-Encoding: gzip, deflate, br
  - Accept-Language: en-US,en;q=0.5
  - Connection: keep-alive
  - Host: manifest.prod.boltdns.net
  - Origin: <https://www.saksfifthavenue.com>
  - Referer: <https://www.saksfifthavenue.com/>
  - Sec-Fetch-Dest: empty
  - Sec-Fetch-Mode: cors

The screenshot shows the Chrome DevTools Network tab with a list of 467 requests. The selected request is a GET request to `manifest.prod.bol...` with a status of 200. The Headers panel on the right shows the following details:

- Filter Headers:** Block, Resend
- Request Headers (655 B):**
  - Accept: \*/\*
  - Accept-Encoding: gzip, deflate, br
  - Accept-Language: en-US,en;q=0.5
  - Connection: keep-alive
  - Host: manifest.prod.boltdns.net
  - Origin: <https://www.saksfifthavenue.com>
  - Referer: <https://www.saksfifthavenue.com/>
  - Sec-Fetch-Dest: empty
  - Sec-Fetch-Mode: cors
  - Sec-Fetch-Site: cross-site
  - User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/2010101 Firefox/108.0

The screenshot shows the Network tab of a web browser's developer tools. The left pane lists 468 requests, including several GET requests to 'recaptcha\_en.js' and a large number of POST requests to 'rum.brows...' with 'sdk\_version' parameters. The right pane shows the 'Response' for a selected request, displaying a JSON payload with fields like 'EXTM3U', 'EXT-X-VERSION:3', 'EXT-X-PLAYLIST-TYPE:VOD', 'EXT-X-MEDIA-SEQUENCE:0', 'EXT-X-TARGETDURATION:10', and a long list of media segments with their respective URLs and durations.

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

The screenshot shows the Network tab of a web browser's developer tools. The left pane lists 469 requests, including several GET requests to 'saks.js' and a large number of GET requests to 'segment1.ts?akamai\_token=exp=1672245598~ad=/media/v1/72f...' with various parameters. The right pane shows the 'Response Headers' for a selected request, displaying a list of headers including 'Accept-Ranges: bytes', 'Access-Control-Allow-Headers', 'Access-Control-Allow-Methods', 'Access-Control-Allow-Origin', 'Access-Control-Expose-Headers', 'Alt-Svc', 'Backend-IP', 'BC-MID', 'Cache-Control', 'Connection', 'Content-Length', 'Content-Type', 'Date', 'ETag', 'Expires', and 'Last-Modified'.



The screenshot displays the Network tab of a web browser. The main pane shows a list of requests, with the selected request being a GET to 'segment11.ts?akamai\_token=exp=1672245598~ad=/media/v1 72fc...' with a status of 200. The right pane shows the request headers, including 'Accept: \*/\*', 'Accept-Encoding: gzip, deflate, br', 'Accept-Language: en-US,en;q=0.5', 'Connection: keep-alive', 'Host: bcbolt446c5271-a.akamaihd.net', 'Origin: https://www.saksfifthavenue.com/', 'Referer: https://www.saksfifthavenue.com/', 'Sec-Fetch-Dest: empty', 'Sec-Fetch-Mode: cors', 'Sec-Fetch-Site: cross-site', and 'User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0'.

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

105. On information and belief, Saks receives, by the at least one processor, a media switch identification and the reservation identification for the reservation, the media switch identification identifying the media switch selected to stream the media.

106. On information and belief, Saks receives, by the at least one processor, a state change identification and the reservation identification for the reservation, the state change identification identifying the at least one state change for the at least one state occurring for the session of streaming the media to the at least one of a plurality of viewers, wherein the session initiation state and the session termination state each comprise a reservation identification for the reservation.

107. On information and belief, Saks has been on notice of the '138 patent at least as early as January 26, 2023, when Saks' in-house counsel responded to SITO's counsel's January 9, 2023 letter concerning Saks' infringement of the



patents-in-suit.

108. On information and belief, at least since January 26, 2023, Saks knowingly encouraged and continues to encourage, its customers to directly infringe one or more claims of the '138 patent, including by Saks' actions that include, without limitation, instructing and encouraging its customers to use the Saks Video Streaming Services through the publishing, distribution, and propagation of targeted user emails, shopping offers, support documents, blog posts, live events, and instructions, including but not limited to the examples of such materials cited above.

109. On information and belief, at least since acquiring its January 2023 knowledge of the '138 patent, Saks knows the acts Saks induced its customers to take constitute patent infringement and Saks' encouraging acts result in direct infringement of one or more claims of the '138 patent by its customers.

110. On information and belief, Saks' customers directly infringe at least claim 11 of the '138 patent through their use of the Saks Video Streaming Service.

111. On information and belief, Saks is in violation of 35 U.S.C. § 271(b) and has been, at least since its January 2023 knowledge of the '138 patent, indirectly infringing and continues to indirectly infringe at least claim 11 of the '138 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Saks' users) and possessing specific intent to encourage infringement by Saks' users. The Saks Video Streaming Service is specifically configured to function in accordance with the '138 patent claims.

112. SITO has been damaged by the direct and indirect infringement of Saks, and is suffering and will continue to suffer irreparable harm and damages as a result of this infringement.

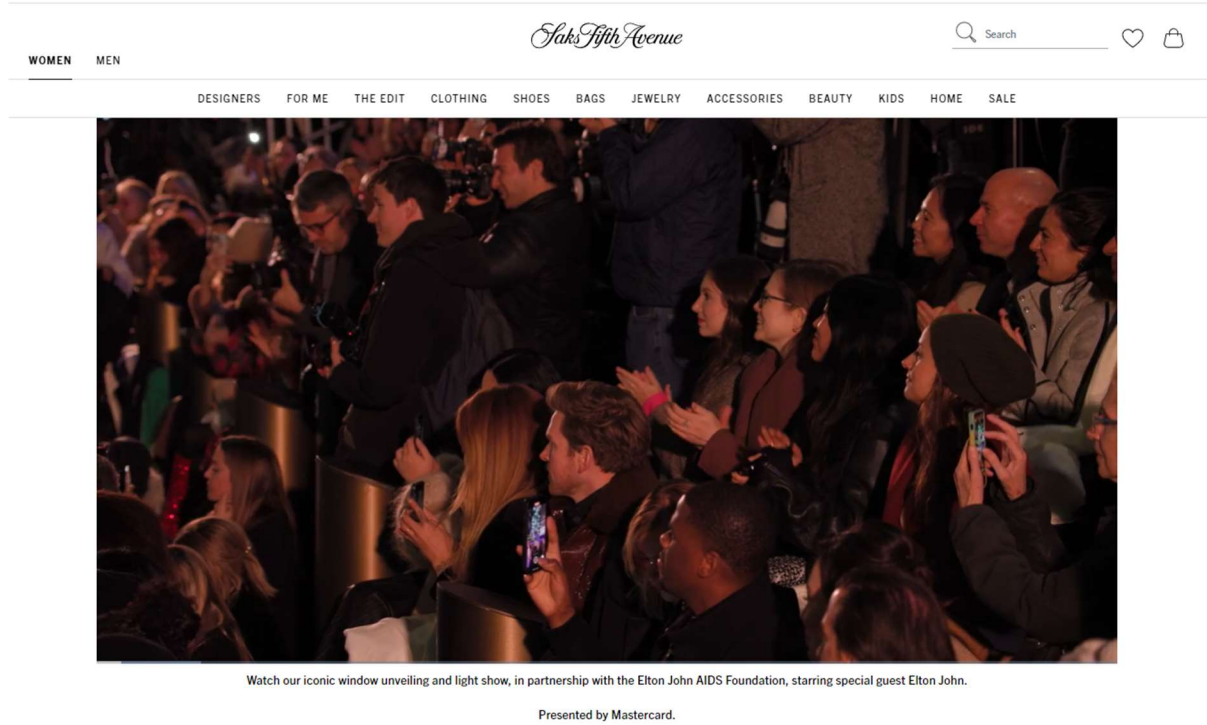
**Count V – Infringement of United States Patent No. 10,735,781**

113. SITO alleges, and incorporates by reference, as if fully set forth here, the preceding paragraphs of this Complaint.

114. Saks directly infringes (literally and/or under the doctrine of equivalents) the '781 patent by using the method covered by at least claim 1 of the '781 patent.

115. On information and belief, and without SITO's approval, authorization and license, Saks owns, controls, operates, and uses a system for streaming media that includes the Saks Streaming Platform, as well as other Saks networks, systems, devices, components, and/or services for streaming media, that practices and infringes the media streaming method recited in at least claim 1 of the '781 patent.

116. Saks performs a method of streaming video content to a client device (*e.g.*, a client device such as a personal computer, mobile device, and/or television) as demonstrated by the example provided below:



See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

117. On information and belief, Saks provides the video content to a content distribution network for storage in a plurality of geographically separated resources of the content distribution network.

118. Saks selects one or more advertisement media clips based on statistical information associated with a user of the client device.

**From Automatic Site or App Data Collection Technologies:** We, or third parties working on our behalf, may use cookies, web beacons, javascript and pixel tags, log files, or other technologies to collect certain non-personally identifying information about visitors to our Site or App, users of our online Services, and interactions with our emails and online advertisements, and to allow Saks to keep track of analytics and certain statistical information. For example, we may collect information such as your browser type, operating system type or mobile device model, viewed webpages, links that are clicked, IP address, mobile device identifier or other unique identifier, sites or apps visited before coming to our Site or App, the amount of time you spend viewing or using the Site or App, the number of times you return, or other click-stream or site usage data, emails we send that you open, forward, or click through to our Site or App. Collecting this information, and linking it with your personal information, helps us to tailor our Site and App and enhance your online shopping experience by saving your preferences while you are visiting a particular Site or App, and to help identify Site or App features, promotions, advertisements, and offers that may be of particular interest to you and retarget online and mobile advertisements to you across computers or devices you may use.

**From Third-Party Sources:** We may acquire information from other sources to update or supplement the information that you provide or that we collect automatically (such as information to validate or update your address or other demographic information), or when you connect with the company through a third party (including through social networks) based on your registration and privacy settings on those third-party sites.

**Combination of Information:** We may combine the information we receive from or about you, including information you provide to us and information we automatically collect through the Site or App, as well as information across other computers or devices that you use, with information we collect or receive about you from other online and offline sources, or from other third-party sources. This may also include using technologies to recognize multiple interactions and combine them into a single customer profile where appropriate.

**From Third-Party Analytics and Advertisements:** We also may use third-party advertisements, analytics, and tracking tools to better understand who is using the Site or App, how people are using the Site or App, how to improve the effectiveness of the Services and related content, and to help us or those third parties serve more targeted advertising to you across our media channels. These third parties may use technology such as cookies, web beacons, javascript and pixel tags, log files, flash cookies, or other technologies to collect and store information. They may also combine information they collect from your interaction with the Site or App with information they collect from other sources, which combination may be subject to the third party's control and privacy policy.

See e.g., <https://www.saksfifthavenue.com/c/content/privacy-policy>

119. Saks receives, from the client device (e.g., personal computer, mobile device, television) via a packet-based telecommunication network (e.g., Internet), signaling (e.g., GET request) to have the stored video content streamed to the client device as demonstrated by the example provided below:



Network tab showing a list of requests. The selected request is a GET to `https://8270149.fs.doubleclick.net/activitysrc=8270149?type=landi0cat=saks-Oord=1num=27`. The right pane shows the response headers:

```

Status: 200 OK
Version: HTTP/3
Transferred: 1.20 kB (575 B size)
Referrer Policy: strict-origin-when-cross-origin
Blocking: Enhanced Tracking Protection
  This URL matches a known tracker and it would be blocked with Content Blocking enabled.
Response Headers (903 B):
  alt-svc: h3="443"; ma=2592000,h3-29="443"; ma=2592000,h3-Q050="443"; ma=2592000,h3-Q046="443"; ma=2592000,h3-Q043="443"; ma=2592000,q-ua="443"; ma=2592000; v="46.43"
  cache-control: no-cache, must-revalidate
  content-encoding: br
  content-length: 299
  content-type: text/html; charset=UTF-8
  cross-origin-resource-policy: cross-origin
  date: Wed, 28 Dec 2022 10:20:50 GMT
  expires: Fri, 01 Jan 1990 00:00:00 GMT
  p3p: policyref="https://googleads.g.doubleclick.net/pagead/clk_p3p.xml", CP="CURa ADMa DEVa TAlo PSAo PSDo OUR IND UNI PUR INT DEM STA PRE COM NAV OTC NOI DSP COR"
  pragma: no-cache
  server: cafe
  set-cookie: test_cookie=CheckForPermission; expires=Wed, 28-Dec-2022 10:35:5

```

Network tab showing a list of requests. The selected request is a GET to `https://8270149.fs.doubleclick.net/activitysrc=8270149?type=landi0cat=saks-Oord=1num=27`. The right pane shows the request headers:

```

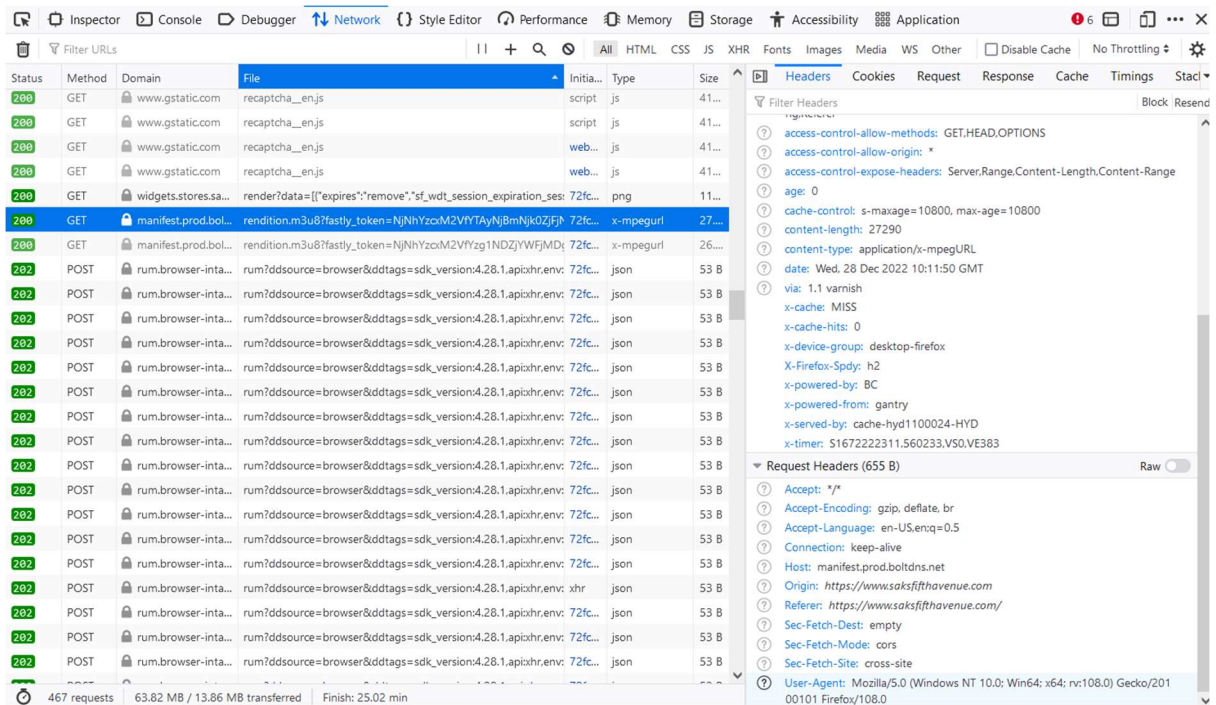
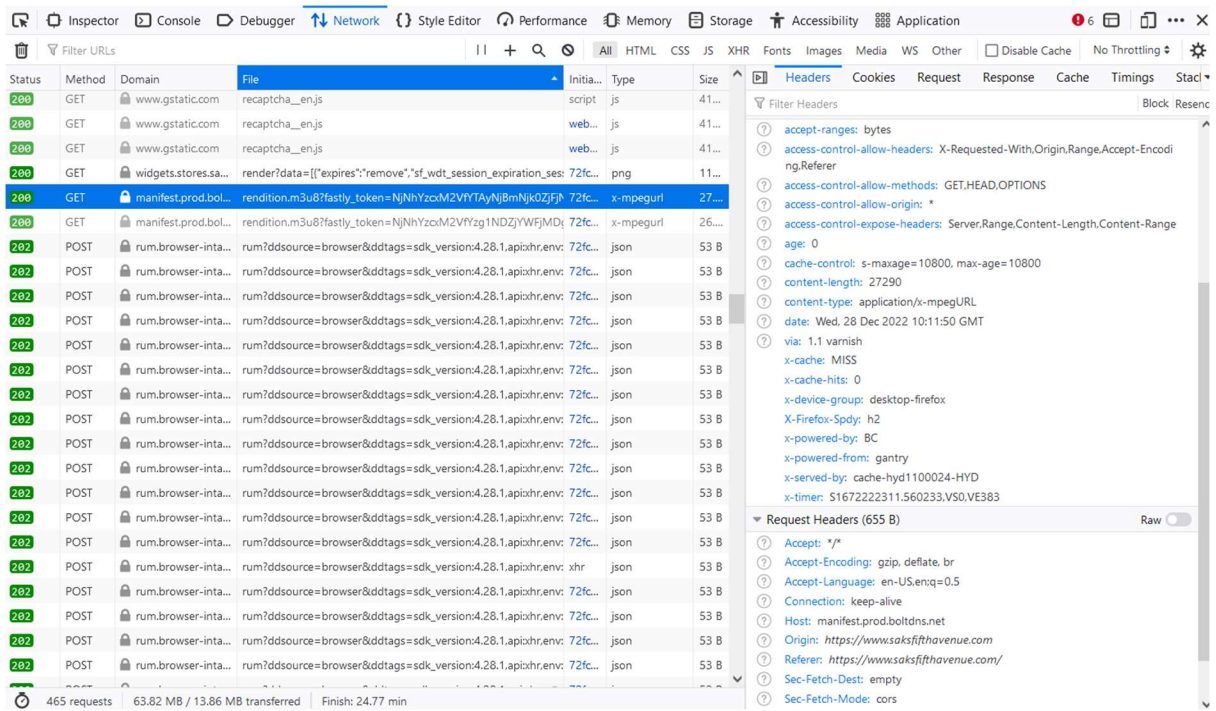
Request Headers (796 B):
  Accept: text/html,application/xhtml+xml,application/xml;q=0.9,image/avif,image/webp,*/*;q=0.8
  Accept-Encoding: gzip, deflate, br
  Accept-Language: en-US,en;q=0.5
  Alt-Used: 8270149.fs.doubleclick.net
  Connection: keep-alive
  Host: 8270149.fs.doubleclick.net
  Referer: https://www.saksfifthavenue.com/
  Sec-Fetch-Dest: iframe
  Sec-Fetch-Mode: navigate
  Sec-Fetch-Site: cross-site
  Upgrade-Insecure-Requests: 1
  User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0

```

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

120. In response to the received signaling (e.g., GET request), Saks transmits one or more files (e.g., (M3U8 file)) having a format compatible with a media player on the client device (e.g., personal computer, mobile device, television) over the packet-

based telecommunication network (*e.g.*, the Internet) as demonstrated by the example provided below:



[illegible]

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

121. The M3U8 includes an identification (*e.g.*, URL that resolves an IP address) of one or more of the resources (*e.g.*, media streaming server(s)) of the content distribution network available to facilitate streaming of one or more segments of the stored video content to the client device (*e.g.*, personal computer, mobile device, television), the identification is dependent at least in part on a relationship between a geographic location of the client device and geographic locations (*e.g.*, CDNs) of the resources of the content distribution network as demonstrated by the examples provided below:



68



[illegible]

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

Inspector
Console
Debugger
Network
Style Editor
Performance
Memory
Storage
Accessibility
Application

Filter URLs

All
HTML
CSS
JS
XHR
Fonts
Images
Media
WS
Other
Disable Cache
No Throttling

Status	Method	Domain	File	Init...	Type	Size
202	POST	rum.browser-int...	rum?dsource=browser&dtags=sd&version=4.28.1.apizhen	72f...	json	53 B
200	GET	px.owneriq.net	saksjs	72f...	js	14...
200	GET	cdn.cookiekafar	Saks_540x540px.jpg	72f...	octet-stream	51...
304	GET	4af61bf97ed.ced...	scripts	72f...	script	32...
200	GET	us-u.openx.net	sd?cc=1&id=537073059&val=Q7255092541559044781j	eps...	gif	43 B
302	GET	us-u.openx.net	sd?id=537073059&val=Q7255092541559044781j	eps...	gif	43 B
200	GET	widgets.turnto.c...	search-page.85fab630c39f13726fdb49839afabf1.en_US.js	script	js	56...
200	GET	bbc01446c5271...	segment1.ts?akamai_token=exp=1672245598~ad=/media/v1	72f...	mp2t	3.1...
200	GET	bbc01446c5271...	segment1.ts?akamai_token=exp=1672245570~ad=/media/v1	72f...	mp2t	31...
200	GET	bbc01446c5271...	segment1.ts?akamai_token=exp=1672245598~ad=/media/v1	72f...	mp2t	74...
200	GET	bbc01446c5271...	segment1.ts?akamai_token=exp=1672245603~ad=/media/v1	72f...	mp2t	17...
200	GET	bbc01446c5271...	segment10.ts?akamai_token=exp=1672245598~ad=/media/v	72f...	mp2t	91...
200	GET	bbc01446c5271...	segment10.ts?akamai_token=exp=1672245603~ad=/media/v	72f...	mp2t	17...
200	GET	bbc01446c5271...	segment11.ts?akamai_token=exp=1672245598~ad=/media/v	72f...	mp2t	74...
200	GET	bbc01446c5271...	segment11.ts?akamai_token=exp=1672245603~ad=/media/v	72f...	mp2t	17...
200	GET	bbc01446c5271...	segment12.ts?akamai_token=exp=1672245598~ad=/media/v	72f...	mp2t	49...
200	GET	bbc01446c5271...	segment12.ts?akamai_token=exp=1672245603~ad=/media/v	72f...	mp2t	17...
200	GET	bbc01446c5271...	segment13.ts?akamai_token=exp=1672245598~ad=/media/v	72f...	mp2t	44...
200	GET	bbc01446c5271...	segment13.ts?akamai_token=exp=1672245603~ad=/media/v	72f...	mp2t	17...
200	GET	bbc01446c5271...	segment14.ts?akamai_token=exp=1672245598~ad=/media/v	72f...	mp2t	38...
200	GET	bbc01446c5271...	segment14.ts?akamai_token=exp=1672245603~ad=/media/v	72f...	mp2t	17...
200	GET	bbc01446c5271...	segment15.ts?akamai_token=exp=1672245598~ad=/media/v	72f...	mp2t	47...
200	GET	bbc01446c5271...	segment15.ts?akamai_token=exp=1672245603~ad=/media/v	72f...	mp2t	17...
200	GET	bbc01446c5271...	segment16.ts?akamai_token=exp=1672245598~ad=/media/v	72f...	mp2t	63...

469 requests
63.82 MB / 13.86 MB transferred
Finish: 26.69 min

Headers
Cookies
Request
Response
Cache
Timings
Stack Tr

Filter Headers
Block Rese

GET https://bbc01446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c0233ee7436-469b-b51c-716d13526265/be274a22-17c2-494-99a2-01a9c8237646/5x/segment1.ts?akamai\_token=exp=1672245569~ad=/media/v1/hls/v4/clear/5680571043001/c0233ee7436-469b-b51c-716d13526265/be274a22-17c2-494-99a2-01a9c8237646?~hmac=f9d07b25c6b475aa57adb1e984702941d9ab2b755e71625a9207c166136

Status: 200 OK
Version: HTTP/1.1
Transferred: 3.16 MB (3.16 MB size)
Referrer Policy: strict-origin-when-cross-origin

Response Headers (1.034 kB)
Raw

Accept-Ranges: bytes
Access-Control-Allow-Headers: X-Requested-With,Origin,Range,Accept-Encodin
g.Referer,CMCD-Request,CMCD-Object,CMCD-Status,CMCD-Session
Access-Control-Allow-Methods: GET,HEAD,OPTIONS
Access-Control-Allow-Origin: \*
Access-Control-Expose-Headers: Server,Range,Content-Length,Content-Range,
Akamai-Mon-lucid-Id,Akamai-Mon-lucid-DeLAkamai-Request-BC
Akamai-Mon-Lucid-DeL: 1315351
Alt-Svc: h3-Q050="443"; ma=93600,quic="443"; ma=93600; v="46,43"
Backend-IP: 13.35.90.38
BC-MID: true
Cache-Control: public, max-age=29672241
Connection: keep-alive
Content-Length: 3164792
Content-Type: video/MP2T
Date: Wed, 28 Dec 2022 10:11:33 GMT
ETag: "511d1266fe0a5e003d095c7b70e2164"
Expires: Wed, 06 Dec 2023 20:28:54 GMT
Last-Modified: Fri, 01 Jan 2016 00:00:00 GMT

The screenshot shows the Network tab of a web browser's developer tools. The list of requests includes several GET requests to 'segment1.ts?akamai\_token=exp=1672245598~ad=/media/v1 72fc...' from 'bcbolt446c5271...'. The selected request is a GET request to 'segment1.ts?akamai\_token=exp=1672245598~ad=/media/v1 72fc...' from 'bcbolt446c5271...'. The 'Headers' panel on the right shows the request headers, including 'Accept: \*/\*', 'Accept-Encoding: gzip, deflate, br', 'Accept-Language: en-US,en;q=0.5', 'Connection: keep-alive', 'Host: bcbolt446c5271-a.akamaihd.net', 'Origin: https://www.saksfifthavenue.com', 'Referer: https://www.saksfifthavenue.com/', 'Sec-Fetch-Dest: empty', 'Sec-Fetch-Mode: cors', 'Sec-Fetch-Site: cross-site', and 'User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0'.

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

122. The M3U8 includes an identification of an advertising server, the identification of the advertising server being dependent at least in part on a relationship between the geographic location (e.g., CDNs) of the client device (e.g., personal computer, mobile device, television) and a geographic location of the advertising server.

**From Automatic Site or App Data Collection Technologies:** We, or third parties working on our behalf, may use cookies, web beacons, javascript and pixel tags, log files, or other technologies to collect certain non-personally identifying information about visitors to our Site or App, users of our online Services, and interactions with our emails and online advertisements, and to allow Saks to keep track of analytics and certain statistical information. For example, we may collect information such as your browser type, operating system type or mobile device model, viewed webpages, links that are clicked, IP address, mobile device identifier or other unique identifier, sites or apps visited before coming to our Site or App, the amount of time you spend viewing or using the Site or App, the number of times you return, or other click-stream or site usage data, emails we send that you open, forward, or click through to our Site or App. Collecting this information, and linking it with your personal information, helps us to tailor our Site and App and enhance your online shopping experience by saving your preferences while you are visiting a particular Site or App, and to help identify Site or App features, promotions, advertisements, and offers that may be of particular interest to you and retarget online and mobile advertisements to you across computers or devices you may use.

**From Third-Party Sources:** We may acquire information from other sources to update or supplement the information that you provide or that we collect automatically (such as information to validate or update your address or other demographic information), or when you connect with the company through a third party (including through social networks) based on your registration and privacy settings on those third-party sites.

**Combination of Information:** We may combine the information we receive from or about you, including information you provide to us and information we automatically collect through the Site or App, as well as information across other computers or devices that you use, with information we collect or receive about you from other online and offline sources, or from other third-party sources. This may also include using technologies to recognize multiple interactions and combine them into a single customer profile where appropriate.

**From Third-Party Analytics and Advertisements:** We also may use third-party advertisements, analytics, and tracking tools to better understand who is using the Site or App, how people are using the Site or App, how to improve the effectiveness of the Services and related content, and to help us or those third parties serve more targeted advertising to you across our media channels. These third parties may use technology such as cookies, web beacons, javascript and pixel tags, log files, flash cookies, or other technologies to collect and store information. They may also combine information they collect from your interaction with the Site or App with information they collect from other sources, which combination may be subject to the third party's control and privacy policy.

See e.g., <https://www.saksfifthavenue.com/c/content/privacy-policy>

123. The M3U8 causes the client device to communicate with resources (e.g., media streaming servers) of the content distribution network and the advertising server to cause the one or more segments of the stored video to be streamed to the client device (e.g., personal computer, mobile device, television) by the identified one or more resources of the content distribution network and cause one or more advertisements to be streamed from the advertising server to the client device.



The screenshot displays the Network tab of a web browser's developer tools. The left pane shows a list of network requests, with the selected request being a GET to `https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b-b51c-716d13526265/be274a22-17c2-49f4-99a2-01a9c8237646/5x/segment1.ts?akamai_token=exp=1672245569~ad=/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b-b51c-716d13526265/be274a22-17c2-49f4-99a2-01a9c8237646/*~hmac=fd90d7b25c6b475aa57adb1eb984702941d9ab2b755fe71625a9207c1661638`. The right pane shows the response headers for this request.

Status	Method	Domain	File	Initi...	Type	Size
200	POST	rum.browser-int...	rum?ddsource=browser&ddtags=sdm_version:4.28.1.apisr...	72fc...	json	53 B
200	GET	px.cdn.cookiecra...	saks.js	72fc...	js	14...
200	GET	cdn.cookiecra...	Saks_540x540px.jpg	72fc...	octet-stream	51...
200	GET	us-us.openx.net	script.js	72fc...	script	32...
200	GET	us-us.openx.net	sd?cc=1&id=537073059&val=Q7255092541559044781j	eps...	gif	43 B
200	GET	us-us.openx.net	sd?id=537073059&val=Q7255092541559044781j	eps...	gif	43 B
200	GET	widgits.turnto.c...	search-page.85fab630c39f13726fdb49839afba1.en_US.js	script	js	56...
200	GET	bcbolt446c5271...	segment1.ts?akamai_token=exp=1672245569~ad=/media/v1	72fc...	mp2t	3.1...
200	GET	bcbolt446c5271...	segment1.ts?akamai_token=exp=1672245570~ad=/media/v1	72fc...	mp2t	31...
200	GET	bcbolt446c5271...	segment1.ts?akamai_token=exp=1672245598~ad=/media/v1	72fc...	mp2t	74...
200	GET	bcbolt446c5271...	segment1.ts?akamai_token=exp=1672245603~ad=/media/v1	72fc...	mp2t	17...
200	GET	bcbolt446c5271...	segment10.ts?akamai_token=exp=1672245598~ad=/media/v1	72fc...	mp2t	91...
200	GET	bcbolt446c5271...	segment10.ts?akamai_token=exp=1672245603~ad=/media/v1	72fc...	mp2t	17...
200	GET	bcbolt446c5271...	segment11.ts?akamai_token=exp=1672245598~ad=/media/v1	72fc...	mp2t	74...
200	GET	bcbolt446c5271...	segment11.ts?akamai_token=exp=1672245603~ad=/media/v1	72fc...	mp2t	17...
200	GET	bcbolt446c5271...	segment12.ts?akamai_token=exp=1672245598~ad=/media/v1	72fc...	mp2t	49...
200	GET	bcbolt446c5271...	segment12.ts?akamai_token=exp=1672245603~ad=/media/v1	72fc...	mp2t	17...
200	GET	bcbolt446c5271...	segment13.ts?akamai_token=exp=1672245598~ad=/media/v1	72fc...	mp2t	44...
200	GET	bcbolt446c5271...	segment13.ts?akamai_token=exp=1672245603~ad=/media/v1	72fc...	mp2t	17...
200	GET	bcbolt446c5271...	segment14.ts?akamai_token=exp=1672245598~ad=/media/v1	72fc...	mp2t	38...
200	GET	bcbolt446c5271...	segment14.ts?akamai_token=exp=1672245603~ad=/media/v1	72fc...	mp2t	17...
200	GET	bcbolt446c5271...	segment15.ts?akamai_token=exp=1672245598~ad=/media/v1	72fc...	mp2t	47...
200	GET	bcbolt446c5271...	segment15.ts?akamai_token=exp=1672245603~ad=/media/v1	72fc...	mp2t	17...
200	GET	bcbolt446c5271...	segment16.ts?akamai_token=exp=1672245598~ad=/media/v1	72fc...	mp2t	63...

469 requests 63.82 MB / 13.86 MB transferred Finish: 26.69 min

**Response Headers (1.034 kB)**

- Accept-Ranges: bytes
- Access-Control-Allow-Headers: X-Requested-With, Origin, Range, Accept-Encoding, Referer, CMCD-Request, CMCD-Object, CMCD-Status, CMCD-Session
- Access-Control-Allow-Methods: GET, HEAD, OPTIONS
- Access-Control-Allow-Origin: \*
- Access-Control-Expose-Headers: Server, Range, Content-Length, Content-Range, Akamai-Mon-lucid-Ing, Akamai-Mon-lucid-Del, Akamai-Request-BC, Akamai-Mon-lucid-Del: 1315351
- Alt-Svc: h3-Q050="443"; ma=93600, quic="443"; ma=93600; v="46,43"
- Backend-IP: 13.35.90.38
- BC-MID: true
- Cache-Control: public, max-age=29672241
- Connection: keep-alive
- Content-Length: 3164792
- Content-Type: video/MP2T
- Date: Wed, 28 Dec 2022 10:11:33 GMT
- ETag: "511d1266fe0a5e003d095c7fb70e2164"
- Expires: Wed, 06 Dec 2023 20:28:54 GMT
- Last-Modified: Fri, 01 Jan 2016 00:00:00 GMT

**Request Headers (751 B)**

- Accept: \*/\*
- Accept-Encoding: gzip, deflate, br
- Accept-Language: en-US,en;q=0.5
- Connection: keep-alive
- Host: bcbolt446c5271-a.akamaihd.net
- Origin: https://www.saksfifthavenue.com
- Referer: https://www.saksfifthavenue.com/
- Sec-Fetch-Dest: empty
- Sec-Fetch-Mode: cors
- Sec-Fetch-Site: cross-site
- User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>



**From Automatic Site or App Data Collection Technologies:** We, or third parties working on our behalf, may use cookies, web beacons, javascript and pixel tags, log files, or other technologies to collect certain non-personally identifying information about visitors to our Site or App, users of our online Services, and interactions with our emails and online advertisements, and to allow Saks to keep track of analytics and certain statistical information. For example, we may collect information such as your browser type, operating system type or mobile device model, viewed webpages, links that are clicked, IP address, mobile device identifier or other unique identifier, sites or apps visited before coming to our Site or App, the amount of time you spend viewing or using the Site or App, the number of times you return, or other click-stream or site usage data, emails we send that you open, forward, or click through to our Site or App. Collecting this information, and linking it with your personal information, helps us to tailor our Site and App and enhance your online shopping experience by saving your preferences while you are visiting a particular Site or App, and to help identify Site or App features, promotions, advertisements, and offers that may be of particular interest to you and retarget online and mobile advertisements to you across computers or devices you may use.

**From Third-Party Sources:** We may acquire information from other sources to update or supplement the information that you provide or that we collect automatically (such as information to validate or update your address or other demographic information), or when you connect with the company through a third party (including through social networks) based on your registration and privacy settings on those third-party sites.

**Combination of Information:** We may combine the information we receive from or about you, including information you provide to us and information we automatically collect through the Site or App, as well as information across other computers or devices that you use, with information we collect or receive about you from other online and offline sources, or from other third-party sources. This may also include using technologies to recognize multiple interactions and combine them into a single customer profile where appropriate.

**From Third-Party Analytics and Advertisements:** We also may use third-party advertisements, analytics, and tracking tools to better understand who is using the Site or App, how people are using the Site or App, how to improve the effectiveness of the Services and related content, and to help us or those third parties serve more targeted advertising to you across our media channels. These third parties may use technology such as cookies, web beacons, javascript and pixel tags, log files, flash cookies, or other technologies to collect and store information. They may also combine information they collect from your interaction with the Site or App with information they collect from other sources, which combination may be subject to the third party's control and privacy policy.

See e.g., <https://www.saksfifthavenue.com/c/content/privacy-policy>

124. On information and belief, Saks has been on notice of the '781 patent at least as early as January 26, 2023, when Saks' in-house counsel responded to SITO's counsel's January 9, 2023 letter concerning Saks' infringement of the patents-in-suit.

125. On information and belief, at least since January 26, 2023, Saks knowingly encouraged and continues to encourage, its customers to directly infringe one or more claims of the '781 patent, including by Saks' actions that include, without limitation, instructing and encouraging its customers to use the Saks Video Streaming Services through the publishing, distribution, and propagation of targeted user emails, shopping offers, support documents, blog

posts, live events, and instructions, including but not limited to the examples of such materials cited above.

126. On information and belief, at least since acquiring its January 2023 knowledge of the '781 patent, Saks knows the acts Saks induced its customers to take constitute patent infringement and Saks' encouraging acts result in direct infringement of one or more claims of the '781 patent by its customers.

127. On information and belief, Saks' customers directly infringe at least claim 1 of the '781 patent through their use of the Saks Video Streaming Service.

128. On information and belief, Saks is in violation of 35 U.S.C. § 271(b) and has been, at least since its January 2023 knowledge of the '781 patent, indirectly infringing and continues to indirectly infringe at least claim 1 of the '781 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Saks' users) and possessing specific intent to encourage infringement by Saks' users. The Saks Video Streaming Service is specifically configured to function in accordance with the '781 patent claims.

129. SITO has been damaged by the direct and indirect infringement of Saks, and is suffering and will continue to suffer irreparable harm and damages as a result of this infringement.

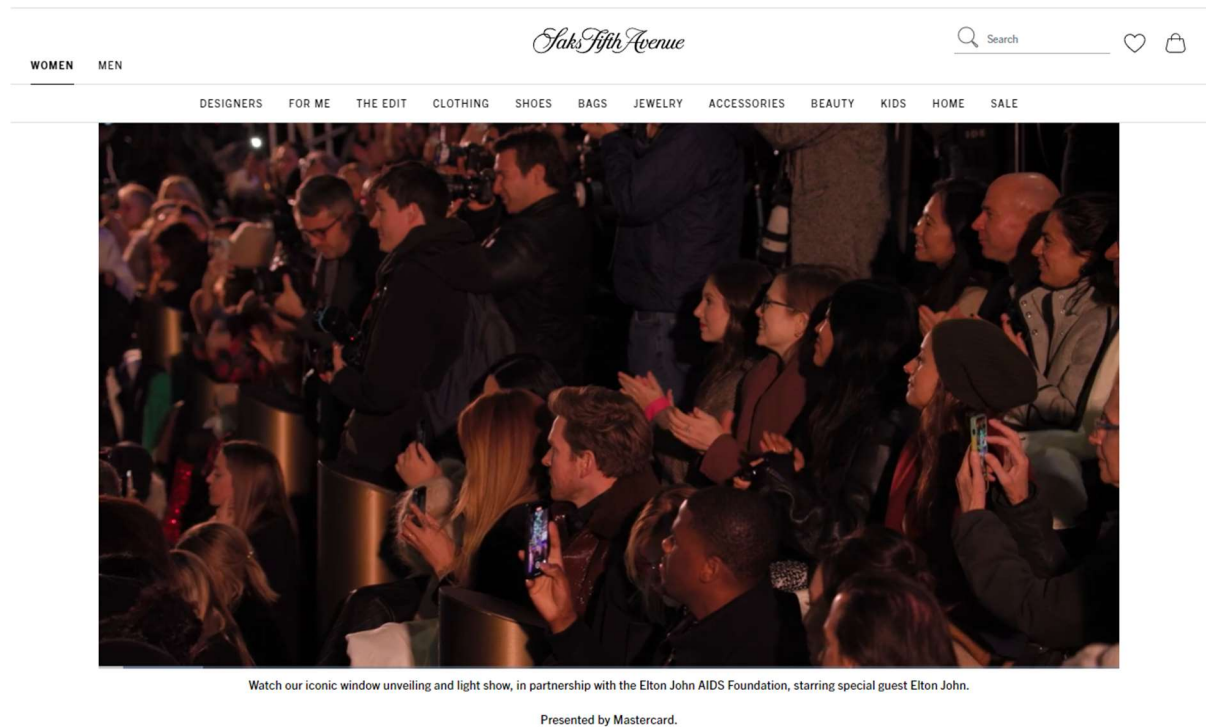
**Count VI - Infringement of United States Patent No. 10,769,675**

130. SITO alleges, and incorporates by reference, as if fully set forth here, the preceding paragraphs of this Complaint.

131. Saks directly infringes (literally and/or under the doctrine of equivalents) the '675 patent by using the method covered by at least claim 31 of the '675 patent.

132. On information and belief, and without SITO's approval, authorization and license, Saks owns, controls, operates, and uses a system for streaming media that includes the Saks Streaming Platform, as well as other Saks networks, systems, devices, components, and/or services for streaming media, that practices and infringes the media streaming method recited in at least claim 31 of the '675 patent.

133. Saks performs a method of streaming video as demonstrated by the example provided below:



See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>



134. On information and belief, Saks receives, from each of a plurality of media owners, media for a plurality of events (*e.g.*, media files/videos) for streaming and one or more media rules (*e.g.*, geographic restrictions) governing transmission of the received media, wherein the one or more media rules are used by the streaming system to determine a streaming sequence for the transmission of the received media and determine one or more streaming resources (*e.g.*, CDNs) to which the received media is to be distributed.

135. Saks receives, from a communication device (*e.g.*, personal computer, mobile device, television) via a communication network (*e.g.*, Internet), a request (*e.g.*, GET request) for media for one of the plurality of events to be streamed to the communication device, the media for the requested event comprising a plurality of segments and the requested event being selected by a user of the communication device from a plurality of event options (*e.g.*, media files/videos).

The screenshot shows the Chrome DevTools Network tab. The left pane displays a list of 493 requests. The selected request is a GET to `https://8270149.fs.doubleclick.net/activity?src=8270149&type=landi0cat=saks-Oord=1&num=27&sub=...`. The right pane shows the response details, including status (200 OK), version (HTTP/3), and various headers.

Status	Method	Domain	File	Initi...	Type	Size
200	GET	www.googletag...	a?id=AW-867837652&cv=1&v=3&t=t&pid=246754650&rv=72fc...	html	0 B	
200	GET	8270149.fs.d...	activity?src=8270149&type=landi0cat=saks-Oord=1&num=27&sub=...	html	57...	
200	GET	www.google.com	anchor?ar=1&k=6LftSaYZAAAAAKUMeZITBWVAsRo1hkbQhnl sub...	html	42...	
200	GET	www.google.com	anchor?ar=1&k=6LftSaYZAAAAAKUMeZITBWVAsRo1hkbQhnl sub...	html	43...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=118&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=129&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=149&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=152&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=170&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=233&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=239&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=264&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=268&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=280&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=298&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=305&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=330&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=333&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=345&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=390&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=400&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=417&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=419&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=440&Availability.prefix=Visi...	js	16...	

493 requests 63.83 MB / 13.88 MB transferred Finish: 40.43 min

**Response Headers (903 B)**

- alt-svc: h3="443"; ma=2592000,h3-29="443"; ma=2592000,h3-Q050="443"; ma=2592000,h3-Q046="443"; ma=2592000,h3-Q043="443"; ma=2592000,q-uc="443"; ma=2592000; v="46.43"
- cache-control: no-cache, must-revalidate
- content-encoding: br
- content-length: 299
- content-type: text/html; charset=UTF-8
- cross-origin-resource-policy: cross-origin
- date: Wed, 28 Dec 2022 10:20:50 GMT
- expires: Fri, 01 Jan 1990 00:00:00 GMT
- p3p: policyref="https://googleads.g.doubleclick.net/pagead/privacy\_policy", CP="CURa ADMa DEVa TAlo PSAo PSDo OUR IND UNI PUR INT DEM STA PRE COM NAV OTC NOI DSP COR"
- pragma: no-cache
- server: cafe
- set-cookie: test\_cookie=CheckForPermission; expires=Wed, 28-Dec-2022 10:35:5

The screenshot shows the Chrome DevTools Network tab. The left pane displays a list of 493 requests. The selected request is a GET to `https://8270149.fs.doubleclick.net/activity?src=8270149&type=landi0cat=saks-Oord=1&num=27&sub=...`. The right pane shows the request details, including headers.

Status	Method	Domain	File	Initi...	Type	Size
200	GET	www.googletag...	a?id=AW-867837652&cv=1&v=3&t=t&pid=246754650&rv=72fc...	html	0 B	
200	GET	8270149.fs.d...	activity?src=8270149&type=landi0cat=saks-Oord=1&num=27&sub=...	html	57...	
200	GET	www.google.com	anchor?ar=1&k=6LftSaYZAAAAAKUMeZITBWVAsRo1hkbQhnl sub...	html	42...	
200	GET	www.google.com	anchor?ar=1&k=6LftSaYZAAAAAKUMeZITBWVAsRo1hkbQhnl sub...	html	43...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=118&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=129&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=149&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=152&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=170&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=233&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=239&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=264&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=268&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=280&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=298&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=305&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=330&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=333&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=345&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=390&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=400&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=417&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=419&Availability.prefix=Visi...	js	16...	
200	GET	d.la5-c1-ia4.s...	Availability.json?sid=undefined&r=440&Availability.prefix=Visi...	js	16...	

493 requests 63.83 MB / 13.88 MB transferred Finish: 40.43 min

**Request Headers (796 B)**

- Accept: text/html,application/xhtml+xml,application/xml;q=0.9,image/avif,image/webp,\*/\*;q=0.8
- Accept-Encoding: gzip, deflate, br
- Accept-Language: en-US,en;q=0.5
- Alt-Used: 8270149.fs.doubleclick.net
- Connection: keep-alive
- Host: 8270149.fs.doubleclick.net
- Referer: https://www.saksfifthavenue.com/
- Sec-Fetch-Dest: iframe
- Sec-Fetch-Mode: navigate
- Sec-Fetch-Site: cross-site
- Upgrade-Insecure-Requests: 1
- User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

**Chromium DevTools**

Inspector Console Debugger **Network** { } Style Editor { } Performance { } Memory { } Storage { } Accessibility { } Application { } 6 ⌵ ⋮

Filter URLs | | + 🔍 ⏸️ | All HTML CSS JS XHR Fonts Images Media WS Other ☐ Disable Cache No Throttling ⚙️

Status	Method	Domain	File	Initia...	Type	Size
200	GET	www.gstatic.com	recaptcha_en.js		script	41...
200	GET	www.gstatic.com	recaptcha_en.js		script	41...
200	GET	www.gstatic.com	recaptcha_en.js		web...	41...
200	GET	www.gstatic.com	recaptcha_en.js		web...	41...
200	GET	widgets.stores.a...	render?data=[{"expires":"","remove","sf_wdt_session_expiration_ses":72f...		png	11...
200	GET	manifest.prod.bol...	rendition.m3u8?fastly_token=NjNhYzcxM2VlZDYyNDZjYWJmNjk0ZjFj...72fc...		x-mpegurl	27...
200	GET	manifest.prod.bol...	rendition.m3u8?fastly_token=NjNhYzcxM2VlZDYyNDZjYWJmNjk0ZjFj...72fc...		x-mpegurl	26...
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sdk_version:4.28.1.apixhr.env:72fc...		json	53 B

467 requests 63.82 MB / 13.86 MB transferred Finish: 25.02 min

**Headers** Cookies Request Response Cache Timings Stal...

Filter Headers Block Resend

- access-control-allow-methods: GET,HEAD,OPTIONS
- access-control-allow-origin: \*
- access-control-expose-headers: Server,Range,Content-Length,Content-Range
- age: 0
- cache-control: s-maxage=10800, max-age=10800
- content-length: 27290
- content-type: application/x-mpegURL
- date: Wed, 28 Dec 2022 10:11:50 GMT
- via: 1.1 varnish
- x-cache: MISS
- x-cache-hits: 0
- x-device-group: desktop-firefox
- X-Firefox-Spdy: h2
- x-powered-by: BC
- x-powered-from: gantry
- x-served-by: cache-hyd1100024-HYD
- x-timer: S167222311.560233.VS0.VE383

**Request Headers (655 B)** Raw

- Accept: \*/\*
- Accept-Encoding: gzip, deflate, br
- Accept-Language: en-US,en;q=0.5
- Connection: keep-alive
- Host: manifest.prod.boltdns.net
- Origin: https://www.saksifithavenue.com
- Referer: https://www.saksifithavenue.com/
- Sec-Fetch-Dest: empty
- Sec-Fetch-Mode: cors
- Sec-Fetch-Site: cross-site
- User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100110 Firefox/108.0



[illegible]

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

136. In response to the received request (*e.g.*, GET request), Saks transmits one or more files (*e.g.*, (M3U8 file)) to the communication device (*e.g.*, personal computer, mobile device, television) over the packet-based telecommunication network (*e.g.*, the Internet) as demonstrated by the example provided below:

Inspector
Console
Debugger
Network
Style Editor
Performance
Memory
Storage
Accessibility
Application

Filter URLs

||

+

Q

All

HTML

CSS

JS

XHR

Fonts

Images

Media

WS

Other

Disable Cache

No Throttling

Status	Method	Domain	File	Initia...	Type	Size
200	GET	www.gstatic.com	recaptcha_en.js	script	js	41...
200	GET	www.gstatic.com	recaptcha_en.js	script	js	41...
200	GET	www.gstatic.com	recaptcha_en.js	web...	js	41...
200	GET	www.gstatic.com	recaptcha_en.js	web...	js	41...
200	GET	widgets.stores.a...	render?data=[{"expires":"remove","sf_wdt_session_expiration_ses: 72fc...		png	11...
200	GET	manifest.prod.bol...	rendition.m3u8?fastly_token=NjNhYzcxMzVhYjBmNjk0ZjFj...&f2fc...	x-mpegurl		27...
200	GET	manifest.prod.bol...	rendition.m3u8?fastly_token=NjNhYzcxMzVhYjBmNjk0ZjFj...&f2fc...	x-mpegurl		26...
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B
202	POST	rum.browser-inta...	rum?ddsource=browser&ddtags=sd_k_version:4.28.1.apixhr.env: 72fc...		json	53 B

467 requests

63.82 MB / 13.86 MB transferred

Finish: 25.02 min

Headers

Cookies

Request

Response

Cache

Timings

Stall

Filter Headers

access-control-allow-methods: GET,HEAD,OPTIONS

access-control-allow-origin: \*

access-control-expose-headers: Server,Range,Content-Length,Content-Range

age: 0

cache-control: s-maxage=10800, max-age=10800

content-length: 27290

content-type: application/x-mpegURL

date: Wed, 28 Dec 2022 10:11:50 GMT

via: 1.1 varnish

x-cache: MISS

x-cache-hits: 0

x-device-group: desktop-firefox

X-Firefox-Spdy: h2

x-powered-by: BC

x-powered-from: gantry

x-served-by: cache-hyd1100024-HYD

x-timer: S167222311.560233.VS0.VE383

Request Headers (655 B)

Accept: \*/\*

Accept-Encoding: gzip, deflate, br

Accept-Language: en-US,en;q=0.5

Connection: keep-alive

Host: manifest.prod.boltdns.net

Origin: https://www.saksfitthavenue.com

Referer: https://www.saksfitthavenue.com/

Sec-Fetch-Dest: empty

Sec-Fetch-Mode: cors

Sec-Fetch-Site: cross-site

User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0

The screenshot shows a network request for a manifest file. The 'Response' tab is selected, displaying a JSON payload. The payload includes a 'URL' field with a long URL: <https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b>. The payload also includes a 'URL' field with a long URL: <https://bcbolt446c5271-a.akamaihd.net/media/v1/hls/v4/clear/5680571043001/c02c33ee-7436-469b>.

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

137. The M3U8 file includes one or more references (e.g., URLs/filename) to one or more of the segments of the media for the requested event (e.g., video).

The screenshot shows a network request for a manifest file. The 'Headers' tab is selected, displaying various request headers. The headers include: `accept-ranges: bytes`, `access-control-allow-headers: X-Requested-With, Origin, Range, Accept-Encoding, Referer`, `access-control-allow-methods: GET, HEAD, OPTIONS`, `access-control-allow-origin: *`, `access-control-expose-headers: Server, Range, Content-Length, Content-Range`, `age: 0`, `cache-control: s-maxage=10800, max-age=10800`, `content-length: 27290`, `content-type: application/x-mpegURL`, `date: Wed, 28 Dec 2022 10:11:50 GMT`, `via: 1.1 varnish`, `x-cache: MISS`, `x-cache-hits: 0`, `x-device-group: desktop-firefox`, `X-Firefox-Spdy: h2`, `x-powered-by: BC`, `x-powered-from: gantry`, `x-served-by: cache-hyd1100024-HYD`, `x-timer: S167222311.560233.VS0.VE383`.

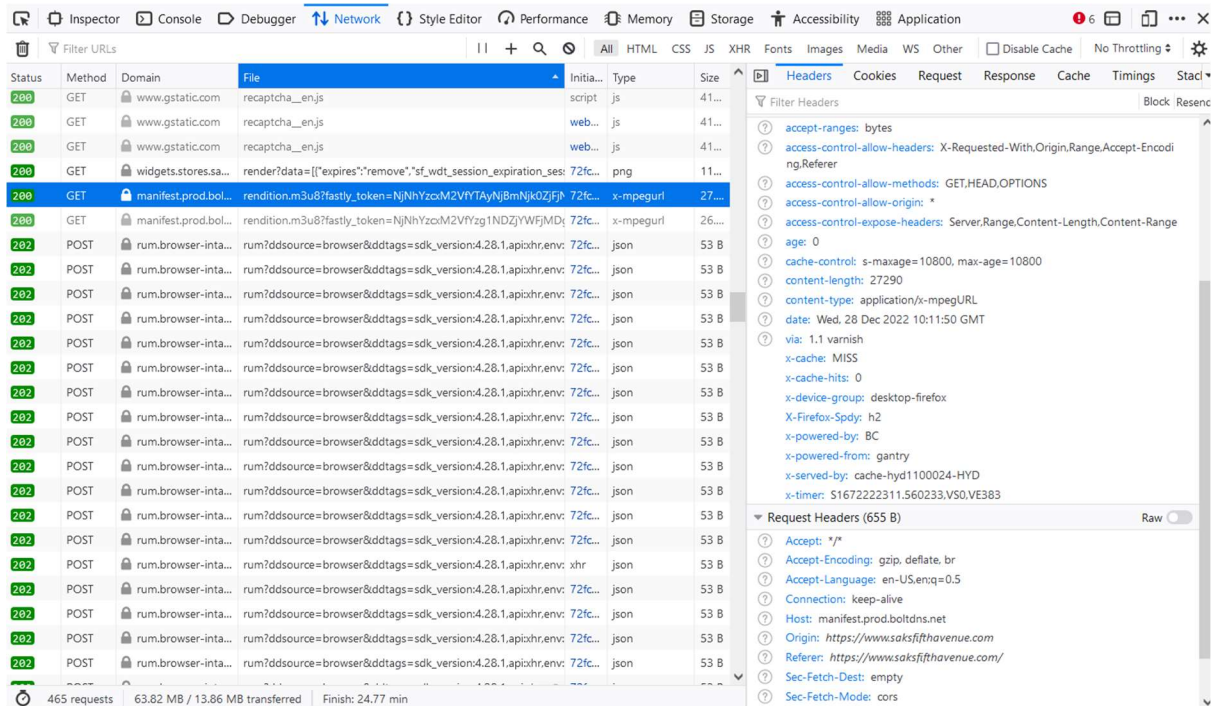


[illegible][illegible]

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

138. On information and belief, the M3U8 file includes information, the information being based at least in part on the one or more media rules (*e.g.*, geographic restrictions), for use by the communication device identifying how to communicate

with the one or more determined resources (*e.g.*, media streaming server/CDN) to cause the one or more segments of the media for the requested event to be streamed to the communication device (*e.g.*, client device) in accordance with the one or more media rules.



The screenshot displays the Chrome DevTools interface, specifically the Network tab. The top toolbar shows various icons for filtering and inspecting requests. Below the toolbar, a table lists network requests with columns for Status, Method, Domain, File, Initia..., Type, Size, and a dropdown menu. The first few rows show GET requests from www.gstatic.com for captcha\_enjs files. A subsequent row shows a GET request from widgets.stores.a... for a render?data=... file. The final row, highlighted in blue, is a GET request from manifest.prod.bol... for a rendition.m3u8?fastly\_token=NjNhYzcyM2VfYTAyNjBmNjk0ZGJl... file.

To the right of the table, the 'Headers' panel is open, displaying the response headers for the selected request. The headers include:

- access-control-allow-methods:** GET,HEAD,OPTIONS
- access-control-allow-origin:**\*
- access-control-expose-headers:** Server,Range,Content-Length,Content-Range
- age:** 0
- cache-control:** s-maxage=10800, max-age=10800
- content-length:** 27290
- content-type:** application/x-mpegURL
- date:** Wed, 28 Dec 2022 10:11:50 GMT
- via:** 1.1 varnish
- x-cache:** MISS
- x-cache-hits:** 0
- x-device-group:** desktop-firefox
- X-Firefox-Spdy:** h2
- x-powered-by:** BC
- x-powered-from:** gantry
- x-served-by:** cache-hyd1100024-HYD
- x-timer:** S16722231.560233.V50.VE383

Below the response headers, the 'Request Headers' section is visible, showing headers like Accept, Accept-Encoding, Accept-Language, Connection, Host, Origin, Referer, Sec-Fetch-Dest, Sec-Fetch-Mode, Sec-Fetch-Site, User-Agent, and Firefox/108.0.

[illegible]

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>



The first screenshot shows a list of 469 requests. The selected request is a GET to segment1.ts?akamai\_token=exp=1672245569~ad=/media/v1/72fc... The response headers include:

- Accept-Ranges: bytes
- Access-Control-Allow-Headers: X-Requested-With,Origin,Range,Accept-Encoding,Referer,CMCD-Request,CMCD-Object,CMCD-Status,CMCD-Session
- Access-Control-Allow-Methods: GET,HEAD,OPTIONS
- Access-Control-Allow-Origin: \*
- Access-Control-Expose-Headers: Server,Range,Content-Length,Content-Range,Akamai-Mon-lucid-Ing,Akamai-Mon-lucid-Del,Akamai-Request-BC,Akamai-Mon-lucid-Del: 1315351
- Alt-Svc: h3-Q050="443"; ma=93600,quic="443"; ma=93600; v="46,43"
- Backend-IP: 13.35.90.38
- BC-MID: true
- Cache-Control: public, max-age=29672241
- Connection: keep-alive
- Content-Length: 3164792
- Content-Type: video/MP2T
- Date: Wed, 28 Dec 2022 10:11:33 GMT
- ETag: "511d1266fe0a5e003d095c7b70e2164"
- Expires: Wed, 06 Dec 2023 20:28:54 GMT
- Last-Modified: Fri, 01 Jan 2016 00:00:00 GMT

The second screenshot shows the same list of requests, but the selected request is a GET to segment1.ts?akamai\_token=exp=1672245570~ad=/media/v1/72fc... The response headers include:

- Accept: \*/\*
- Accept-Encoding: gzip, deflate, br
- Accept-Language: en-US,en;q=0.5
- Connection: keep-alive
- Host: bcbolt446c5271-a.akamaihd.net
- Origin: https://www.saksfifthavenue.com
- Referer: https://www.saksfifthavenue.com/
- Sec-Fetch-Dest: empty
- Sec-Fetch-Mode: cors
- Sec-Fetch-Site: cross-site
- User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:108.0) Gecko/20100101 Firefox/108.0

See e.g., <https://www.saksfifthavenue.com/c/live-stream/video>

139. On information and belief, Saks has been on notice of the '675 patent at least as early as January 26, 2023, when Saks' in-house counsel responded to SITO's counsel's January 9, 2023 letter concerning Saks' infringement of the

patents-in-suit.

140. On information and belief, at least since January 26, 2023, Saks knowingly encouraged and continues to encourage, its customers to directly infringe one or more claims of the '675 patent, including by Saks' actions that include, without limitation, instructing and encouraging its customers to use the Saks Video Streaming Services through the publishing, distribution, and propagation of targeted user emails, shopping offers, support documents, blog posts, live events, and instructions, including but not limited to the examples of such materials cited above.

141. On information and belief, at least since acquiring its January 2023 knowledge of the '675 patent, Saks knows the acts Saks induced its customers to take constitute patent infringement and Saks' encouraging acts result in direct infringement of one or more claims of the '675 patent by its customers.

142. On information and belief, Saks' customers directly infringe at least claim 31 of the '675 patent through their use of the Saks Video Streaming Service.

143. On information and belief, Saks is in violation of 35 U.S.C. § 271(b) and has been, at least since its January 2023 knowledge of the '675 patent, indirectly infringing and continues to indirectly infringe at least claim 31 of the '675 patent by knowingly and specifically intending to induce infringement by others (including, without limitation, Saks' users) and possessing specific intent to encourage infringement by Saks' users. The Saks Video Streaming Service is specifically configured to function in accordance with the '675 patent claims.

144. SITO has been damaged by the direct and indirect infringement of Saks, and is suffering and will continue to suffer irreparable harm and damages as a result of this infringement.

**JURY DEMANDED**

145. Pursuant to Federal Rule of Civil Procedure 38(b), SITO hereby requests a trial by jury on all issues so triable.

**PRAYER FOR RELIEF**

SITO respectfully requests this Court to enter judgment in SITO's favor and against Saks as follows:

- a. finding that Saks directly infringes, literally and/or under the doctrine of equivalents, one or more claims of each of the patents-in-suit;
- b. finding that Saks indirectly infringes, literally and/or under the doctrine of equivalents, one or more claims of each of the patents-in-suit;
- c. awarding SITO damages under 35 U.S.C. § 284, or otherwise permitted by law, including supplemental damages for any continued post-verdict infringement;
- d. awarding SITO pre-judgment and post-judgment interest on the damages award and costs;
- e. awarding costs of this action (including all disbursements) and attorney fees pursuant to 35 U.S.C. § 285, or as otherwise permitted by the law; and
- f. awarding such other costs and further relief that the Court determines to be just and equitable.



June 16, 2023

Respectfully submitted,

/s/ Zachary H. Ellis

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